

Disciplinary and Other FINRA Actions

Reported for
February 2026

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

Intesa Sanpaolo IMI Securities Corp. ([CRD #19418](#), New York, New York)

December 1, 2025 – A Letter of Acceptance, Waiver and Consent (AWC) was issued in which the firm was censured and fined \$125,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to accurately report to the Trade Reporting and Compliance Engine (TRACE) its execution capacity on over 7,000 TRACE-eligible transactions and failed to report to TRACE over 4,000 non-member affiliate transactions. The findings stated that the firm transitioned to an agency booking model and changed the account used to execute fixed income securities trades for its non-member affiliate but failed to communicate to its fixed income desk that the new account was an agency account rather than principal. As a result, the firm reported transactions in TRACE-eligible corporate debt securities and in U.S. Treasury securities in a principal capacity when they should have been reported in an agency capacity. These reports constituted 100 percent of the total corporate debt and U.S. Treasury reports the firm submitted. Ultimately, the firm discovered that it was inaccurately reporting its capacity as a result of an internal review of its operational processes and began reporting the transactions in an agency capacity. In addition, as a result of human error the firm did not report certain transactions between itself and its non-member affiliate. These reports constituted 50 percent of the total corporate debt and U.S. Treasury reports the firm was required to submit. After receiving an inquiry from FINRA, the firm began to correctly report the non-member affiliate transactions. The findings also stated that the firm issued over 11,000 customer trade confirmations to customers that omitted the price of the security due to a coding error. Ultimately, the firm corrected its systems such that the price field is properly populated. The findings also included that the firm did not establish, maintain, and enforce a supervisory system, including written supervisory procedures (WSPs), reasonably designed to achieve compliance with trade confirmation disclosure requirements. The firm's procedures

governing customer confirmations did not include any process to review, and the firm did not review, the confirmations for accuracy or completeness. ([FINRA Case #2024081858901](#))

Barclays Capital Inc. ([CRD #19714](#), New York, New York)

December 2, 2025 – An AWC was issued in which the firm was censured and fined \$325,000. 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, including WSPs, reasonably designed to supervise employee outside brokerage accounts. The findings stated that beginning in March 2020, the firm's offices were closed to employees for an extended period due to the COVID-19 pandemic. Resulting delays and organizational changes created a substantial backlog in unreviewed or missing account statements that the firm failed to timely address. From July 2021 through June 2022, the firm failed to either collect or timely review approximately 8,200 account statements from approximately 700 employee-held outside brokerage accounts, or approximately half of all outside accounts for which the firm did not receive an electronic data feed. During this period, the firm's employees executed 161 trades in these outside accounts without first obtaining preclearance of the trades. These trades were not timely identified as a result of the backlog of unreviewed and missing account statements. Ultimately, the firm modified its review system for manually-reviewed outside account statements by establishing an electronic feed for a significant percentage of these outside accounts and a system for employees to upload statements for accounts without an electronic feed. The firm also commenced an effort to complete its remedial review of the backlog of unreviewed and missing account statements, which it has completed. ([FINRA Case #2023078671001](#))

Navaid Financial Services, Inc. ([CRD #42607](#), Haddonfield, New Jersey)

December 3, 2025 – An AWC was issued in which the firm was censured and fined \$35,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to include the Non-Transaction-Based Compensation (NTBC) indicator when reporting municipal securities transactions to the Municipal Securities Rulemaking Board's (MSRB's) Real-Time Transaction Reporting System (RTRS). The findings stated that the firm reported municipal securities transactions with customers to the RTRS that did not include a mark-up, markdown, or commission. The firm did not include the NTBC indicator on any of those reports because it was unaware of the requirement to include the NTBC indicator. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, that was reasonably designed to ensure compliance with MSRB Rule G-14. The firm lacked WSPs related to the accuracy of its RTRS reporting generally, and in practice the firm did not review its RTRS reporting for accuracy with respect to the NTBC indicator. Subsequently, the firm implemented a process for reviewing RTRS reporting to ensure accuracy and the inclusion of the NTBC indicator for applicable transactions. In addition, the firm amended its WSPs to mandate a review of MSRB reporting. ([FINRA Case #2024082010601](#))

J. Alden Associates, Inc. ([CRD #40002](#), Wayne, Pennsylvania)

December 5, 2025 – An AWC was issued in which the firm was censured and fined \$40,000. 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 it failed to maintain its required minimum net capital during five separate periods. The findings stated that two deficiencies were the result of the firm's failure to compute its net capital using the accrual method of accounting. The firm improperly recorded commissions receivable and payable on dates other than the closing date of the

transactions. The remaining three periods of net capital deficiency were the result of the firm's failure to provide the firm's financial & operations principal (FINOP) with timely, complete, and accurate information that impacted the firm's financial position. The findings also stated that the firm failed to file a timely same-day notification for a net capital deficiency it identified. Consequently, FINRA and the U.S. Securities and Exchange Commission (SEC) were unaware of, and could neither consider nor act upon, the deficiency until it was discovered by FINRA's exam team. The findings also included that the firm failed to prepare and maintain accurate payable and receivable figures on its books and records when it recorded transaction payables and receivables on dates other than the closing dates, resulting in inaccurate aggregate indebtedness and net capital computations. As a result of its failure to use the accrual method of accounting, the firm's general ledger and trial balances were inaccurate as it relates to the firm's revenue, assets, and liabilities during these periods. The firm's record-keeping errors hindered the regulatory monitoring of its financial condition. FINRA found that the firm failed to establish, maintain, and enforce a supervisory system, including WSPs, reasonably designed to achieve compliance with net capital and record-keeping rules. The WSPs provided no guidance as to instances when the FINOP should compute the firm's net capital, other than monthly, so the FINOP did not have guidance for computing net capital at each transaction's close. The firm also failed to provide the FINOP the information required to accurately maintain the firm's books and records or accurately compute the firm's net capital. Ultimately, the firm updated its accounting processes to use the accrual method. ([FINRA Case #2022074390401](#))

Moomoo Financial Inc. fka Futu Inc. ([CRD #283078](#), Jersey City, New Jersey)

December 10, 2025 – An AWC was issued in which the firm was censured, fined \$125,000, 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 failed to have a reasonable supervisory system, including WSPs, concerning Large Options Positions Report (LOPR) reporting and failed to report thousands of positions to the LOPR. The findings stated that the WSPs did not identify how often a firm supervisor should assess or report options positions or provide for any supervisory review to ensure that the reporting is accurate and complete. And until March 2023, the firm had no system or process in place to identify or report its customers' options positions held in omnibus accounts to the LOPR. Ultimately, the firm implemented a tool to identify and report to the LOPR customer options positions held in its omnibus accounts. However, the operating procedures do not indicate how often the LOPR reporting steps should be taken, nor do they provide for any supervisory review of the reporting process or of the accuracy of the data reported to the LOPR. The firm failed to report positions to the LOPR because it failed to identify and report reportable options positions of its customers that were cleared and held on an omnibus basis. After the firm implemented a LOPR reporting system, it had a separate reporting failure to report positions to the LOPR because it deleted expiring option positions from its reports to the LOPR. After FINRA alerted the firm to this issue, it ceased deleting those positions from its LOPR reporting. ([FINRA Case #2023078120201](#))

Flow Traders U.S. Institutional Trading LLC ([CRD #282266](#), New York, New York)

December 11, 2025 – An 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 inaccurately reported transactions to TRACE without the required No Remuneration (NR)

indicator. The findings stated that the firm failed to include the NR indicator in TRACE reports for transactions executed without a mark-up, mark-down, or commission. The firm recorded the NR indicator for these transactions in its internal systems, however, due to a coding error it did not include the indicator in its TRACE reports when it began reporting to TRACE. Subsequently, the firm remediated the error. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to achieve compliance with FINRA rules. The firm failed to conduct reasonable supervisory reviews of the accuracy of its reporting of the NR indicator to TRACE. Given the firm's execution of a substantial volume of trades in TRACE-eligible securities without charging a commission, mark-up, or mark-down, a review of its monthly TRACE report cards, as required by the firm's WSPs, showing no trades reported with the NR indicator should have alerted the firm to a problem with its TRACE reporting. Further, the firm's WSPs did not address the NR indicator or describe how supervisors should conduct reviews of TRACE report cards for NR indicator usage. As a result of its supervisory failures, the firm did not detect that it inaccurately reported transactions to TRACE without the NR indicator. The firm ultimately implemented daily reviews of the accuracy of its reporting of the NR indicator to TRACE and subsequently enhanced its WSPs to include those reviews. ([FINRA Case #2023077446501](#))

Kingswood Capital Partners, LLC ([CRD #288898](#), San Diego, California)

December 12, 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 failed to establish and maintain written procedures reasonably designed to achieve compliance with suitability requirements with respect to alternative investments. The findings stated that the firm's WSPs did not describe what factors supervisors should consider in order to assess concentration in such products, how that determination should be made, or provide any direction as to what would constitute a potentially overconcentrated position. Nor did the WSPs describe what steps should be taken by the firm if a supervisor found a potentially overconcentrated position, or how that review should be documented. The findings also stated that the firm failed to reasonably supervise a registered representative's recommendations of alternative investments to three senior customers where the sales were not suitable given the customers' investment profiles. The seniors all had a moderate risk tolerance and an investment objective of balanced growth. Despite red flags that the representative's recommendations were unsuitable for the customers in light of their investment profiles, the firm failed to conduct a reasonable supervisory review before approving the transactions. As a result, the firm allowed the customers to invest a total of \$284,000 in illiquid alternative investments. The three customers (or their beneficiaries) brought and settled arbitration claims against the firm related to the alternative investments at issue in this AWC. ([FINRA Case #2020068830202](#))

Clear Street LLC ([CRD #288933](#), New York, New York)

December 17, 2025 – An AWC was issued in which the firm was censured and fined \$175,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it routed options orders for execution with inaccurate origin codes, resulting in the execution of 988,170 options contracts with an origin code of "Customer" that should have been coded "Professional Customer." The findings stated that these inaccurate origin codes were reflected in the order memoranda for the options orders in question. The findings also stated that the firm failed to reasonably supervise the accuracy of its options order origin codes. The firm used a report

generated by its third-party post-trade surveillance platform to supervise the accuracy of its options origin codes. However, this report did not accurately reflect the trading activity of the firm's customers because it did not correctly count multi-leg options orders. The firm remediated this supervisory deficiency after being alerted to the issue by FINRA. ([FINRA Case #2022074845301](#))

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

December 19, 2025 – An AWC was issued in which the firm was censured and fined \$225,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it provided inaccurate and incomplete information in 15 published quarterly reports regarding customer orders in National Market System (NMS) securities pursuant to Rule 606 of Regulation NMS under the Securities Exchange Act of 1934. The findings also stated that the firm failed to establish, maintain, and enforce a supervisory system, including WSPs, reasonably designed to achieve compliance with Rule 606 of Regulation NMS. The firm had no procedures and no reasonable process to review the information presented in its Rule 606 reports for completeness or accuracy. The firm conducted a month-to-month comparison of its Rule 606 reports prior to publication. However, its review was not designed to identify whether the information in its Rule 606 reports was complete or accurate. Ultimately, the firm implemented updated WSPs concerning its Rule 606 reports to include supervisory steps designed to assess data accuracy and to determine whether its material aspects information was complete and accurate. ([FINRA Case #2022073414301](#))

Mundial Financial Group, LLC ([CRD #149531](#), New York, New York)

December 19, 2025 – An AWC was issued in which the firm was censured, fined \$100,000, and required to comply with the undertakings enumerated in this AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it allowed the firm's indirect owner to engage in its securities business activities requiring FINRA registration when the indirect owner was not registered with FINRA in any capacity. The findings stated that indirect owner was the firm's primary source of new business, soliciting the majority of the firm's customers and managing relationships with those customers. The indirect owner presented himself as working for the firm, including by use of a firm email address to conduct firm business. The indirect owner also directed aspects of the firm's securities business, including whether and how to develop or fund new business lines and the selection of the firm's clearing firm. The indirect owner also made or was consulted on major operational personnel decisions, including hiring and establishing the salaries of the firm's key employees and exercised control over the firm's finances. The findings also stated that the firm failed to develop and implement a reasonably designed anti-money laundering (AML) compliance program to achieve compliance with customer identification and customer due diligence requirements. The firm failed to establish and implement policies and procedures that could be reasonably expected to detect and cause the reporting of suspicious transactions. While the firm's written procedures included lists of red flags of suspicious transactions, they did not address how to detect or investigate those red flags. The procedures also failed to identify what alerts or reports the firm would use to identify potential suspicious transactions or how those alerts or reports should be utilized. As a result, the firm failed to detect or reasonably investigate red flags of suspicious transactions, including red flags brought directly to its attention by its clearing firm. The firm's AML program lacked appropriate risk-based policies or procedures to identify and report suspicious transactions of potential insider trading. Although the firm began to maintain a list of insiders, it did

not implement any policies or procedures to guide firm personnel about how to monitor the transactions of customers on the list. ([FINRA Case #2022074525601](#))

Credit Suisse Securities (USA) LLC ([CRD #816](#), New York, New York)

December 22, 2025 – An AWC was issued in which the firm was censured and fined a total of \$7,125,000, of which \$445,312.50 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 and maintain a supervisory system and procedures reasonably designed to achieve compliance with federal securities laws and FINRA rules prohibiting various forms of manipulative and insider trading. The findings stated that the hundreds of millions of trade and order records were not sent to the firm's systems for review and analysis. As a result of missing or potentially inaccurate data in its surveillance systems, the firm did not detect and investigate numerous instances of potentially violative trading. The firm's surveillance reports also did not detect specific instances of potentially violative trading. FINRA's analysis revealed that the firm's surveillances did not detect multiple specific instances of potentially manipulative trading by firm customers including instances of potential spoofing, marking the open, wash trades, and insider trading. Despite the fact that the firm's surveillance reports were highly dependent on the firm's database, the firm had no system or procedure to monitor the accuracy and completeness of the data that the database supplied to the firm's surveillance systems. Four firm audits conducted noted that the database was omitting data and transmitting flawed data, and that the firm lacked controls to compensate for the unreliability of its database. The firm's efforts to address these audit findings included retaining an outside consultant that recommended that the database be replaced because of the risks it posed to the firm's regulatory and compliance program. Nevertheless, the firm did not initially make material progress to replace the database with a new database, and it did not substantially complete the replacement until September 2020. ([FINRA Case #2017056726201](#))

Digital Brokerage Services LLC ([CRD #308213](#), Jersey City, New Jersey)

December 22, 2025 – An AWC was issued in which the firm was censured and fined \$85,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it distributed certain retail communications regarding its mobile application and crypto assets or crypto asset-related services that failed to clearly disclose that the crypto assets were not offered through a registered broker-dealer or that did not provide a fair and balanced presentation of the benefits and risks of the products discussed. The findings stated that after FINRA notified the firm of its violative communications, the firm stopped using certain communications related to crypto assets and undertook a review of the way in which it described crypto assets and crypto asset-related services in its communications and discontinued or updated its communications to achieve compliance with FINRA's content standards. ([FINRA Case #2022076789701](#))

Osaic Institutions, Inc., fka Infinex Investments, Inc. ([CRD #35371](#), Meriden, Connecticut)

December 22, 2025 – An AWC was issued in which the firm was censured, fined \$650,000, 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 failed to establish and implement policies and procedures reasonably designed to detect and cause the reporting of suspicious transactions. The findings stated that the firm's written AML program is derived from a template not tailored to the firm's business and provides incomplete guidance on how to detect and

investigate red flags of suspicious activity. The procedures include no guidance on escalating or investigating potentially suspicious activity, including cyber-events, for the purpose of determining whether to file a Suspicious Activity Report (SAR). The firm relied on AML exception reports to surveil for potentially suspicious trades and money movements that could constitute the basis for a SAR filing, but either those reports did not monitor for numerous red flags that pertained to the firm's business, or the firm failed to review or timely review the reports. The firm also failed to investigate certain activity for potential SAR filings. In total, the firm failed to review at least 30 individual AML exception reports and failed to timely review at least 121 individual AML exception reports. In addition, the firm failed to review attempted but unsuccessful cyber-events for the purpose of determining whether to file a SAR. Ultimately, the firm implemented procedures for its review of AML exception reports. The findings also stated that the firm failed to include in its AML program risk-based procedures for conducting ongoing customer due diligence. The firm's AML policies and procedures are silent on the firm's obligation to maintain and update customer information on a risk basis and therefore do not accurately address the requirements. As a result, the firm has not developed risk profiles for domestic customers and did not do so until December 2023 for foreign customers, at which time it designated all foreign accounts as high-risk. The firm also has not conducted any risk-based ongoing customer due diligence, for either domestic or foreign accounts. ([FINRA Case #2023077031601](#))

The Benchmark Company, LLC ([CRD #22982](#), New York, New York)

December 23, 2025 – An AWC was issued in which the firm was censured and fined \$65,000. 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, including WSPs, reasonably designed to prevent prohibited trade-throughs of protected quotations in National Market System (NMS) securities. The findings stated that the firm's order management system (OMS) had a coding error that caused the firm to send intermarket sweep orders (ISOs) directly to an exchange of which the firm was not a member. The exchange rejected those ISOs, which meant that the firm did not simultaneously route ISOs to execute against the full size of all protected bids or offers as required, and caused the firm to route and execute orders at prices inferior to the exchange's protected quote. The firm fixed the coding error after FINRA notified the firm of the trade-throughs. However, the firm subsequently implemented a system update to its OMS that reintroduced the coding error and again began routing ISOs directly to the exchange. The exchange rejected the ISOs, causing additional route-throughs and trade-throughs. As before, the firm continued to send violative ISOs until FINRA notified the firm and it corrected the coding error. In total, the firm sent 1,427 ISOs directly to the exchange, which were rejected. As a result, the rejected ISOs caused additional simultaneously routed ISOs to route through or trade through one or more protected quotes in approximately 1,770 instances. The findings also stated that the firm failed to establish, maintain, and enforce written policies and procedures reasonably designed to prevent trade-throughs. The firm's written policies and procedures required the firm to review an exception report to identify whether routed ISOs were filled, canceled, or rejected by the venue to which they were routed but the firm did not review the exception report. Even though the firm was on notice from FINRA that it had sent violative ISOs, the firm took no steps to ensure either that its OMS's coding errors did not recur or that the firm reviewed the exception report to detect any violative ISOs. The firm later fixed the coding errors in its OMS and implemented procedures to review, and supervise the review, of the exception report. ([FINRA Case #2022074359701](#))

Carter, Terry & Company, Inc. ([CRD #16365](#), Atlanta, Georgia)

December 24, 2025 – An AWC was issued in which the firm was censured, fined \$75,000, ordered to pay \$176,590.57 in restitution, 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 failed to establish, maintain, and enforce a supervisory system, including WSPs, reasonably designed to achieve compliance with the Care Obligation of Rule 15l-1 of the Securities Exchange Act of 1934 (Reg BI) with respect to unit investment trust (UIT) recommendations. The findings stated that the firm had no written policies or procedures addressing UIT recommendations, including early redemption recommendations. In May 2023, the firm added a section to its WSPs addressing UITs and the need for additional review of early redemption recommendations, but the written policies and procedures still do not require consideration of the costs associated with such a recommendation, nor do they provide criteria for supervisors to determine whether an early redemption of a UIT is in a customer's best interest. The firm flagged UIT transactions for supervisory review based solely on an automated report that identified purchases of UITs following sales or liquidations of UITs, but this report did not identify early redemptions and reviewers were not directed to manually identify early redemptions. Ultimately, the firm began requiring that representatives submit a sales/exchange form for each early UIT redemption, but the firm did not implement a process for ensuring that representatives actually do so, and representatives have failed to submit such forms for over 100 early redemptions. For forms that were submitted, the firm generally accepted the representatives' purported rationales and approved every early UIT redemption that received supervisory review. As a result of the supervisory failures, the firm failed to reasonably supervise a representative who engaged in a pattern of recommendations that customers sell UITs significantly before their maturity dates and then, in almost every instance, roll the proceeds into another UIT, which included instances when the proceeds were invested in the next series of the same UIT. Collectively, these recommendations caused customers to pay \$176,590.57 in costs and fees that they would not have incurred had they held the UITs until their maturity dates. ([FINRA Case #2023078794802](#))

SogoTrade, Inc. ([CRD #17912](#), Chesterfield, Missouri)

December 29, 2025 – An AWC was issued in which the firm was censured, fined \$75,000, 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 failed to establish, document, and maintain a system of risk management controls and supervisory procedures reasonably designed to manage the financial, regulatory, and other risks of its market access business activity, including controls designed to prevent the entry of erroneous orders. The findings stated that the firm's single-order quantity and single-order notional value were not reasonably designed to prevent the firm's customers from entering erroneous orders that exceed appropriate price or size parameters on an order-by-order basis and the firm did not document its rationale for its existing controls. The firm did not maintain a reasonable pre-trade price deviation control designed to reject orders priced more than a certain percentage away from a reference price and did not document its rationale for its existing controls. The firm's single-order price deviation control was not reasonably designed because most of the firm's single-order price deviation limits were set at or above industry-wide execution guidelines under FINRA and applicable exchange rules. In addition, the firm's WSPs relating to market access were not reasonably designed because they

failed to describe the firm's market access controls or the thresholds applied by those controls and the methodology and rationale for how the firm determined the thresholds. The findings also stated that the firm failed to conduct at least annually a review of its market access controls and supervisory procedures and to complete the related chief executive officer (CEO) certifications. Specifically, the firm did not review the overall effectiveness of its risk management controls as designed, including with respect to the reasonableness of the thresholds used. The firm's annual CEO certifications failed to comply with applicable rules because they did not include statements from the CEO that the firm's risk management controls and supervisory procedures comply with paragraphs (b) and (c) of Rule 15c3-5 of the Securities Exchange Act of 1934, or that the firm conducted a review of its business activity related to market access. In December 2024, the firm conducted a review of its market access business activity and in 2025 obtained a certification from its CEO that included the required statements for 2024. ([FINRA Case #2021072154501](#))

A.G.P. / Alliance Global Partners, LLC ([CRD #8361](#), Westport, Connecticut)

December 30, 2025 – An AWC was issued in which the firm was censured, fined \$145,000, of which \$88,079 is payable to FINRA, 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 did not file, or filed untimely or inaccurate, notifications with FINRA in connection with its participation in distributions of securities subject to Regulation M under the Securities Exchange Act of 1934. The findings stated that the firm submitted 21 untimely restricted period notifications, which were between one and 100 days late. The inaccurate notifications failed to identify all participants in the distributions because the firm did not amend notifications when distribution participants joined after an initial restricted period notification was filed. In addition, the firm failed to submit two restricted period notifications because it mistakenly believed that one distribution qualified for an exception to Rule 101 of Regulation M and that the firm's role in the other distribution did not require it to file a restricted period notification. In addition, the firm submitted 23 untimely and three inaccurate trading notifications. The inaccurate notifications failed to identify all the participants in the distributions. The firm also failed to submit three trading notifications. The firm mistakenly believed that two distributions qualified for an exception to Rule 101 of Regulation M and that the firm's role in the other distribution did not require it to file a trading notification. The findings also stated that the firm failed to reasonably supervise its compliance with Rule 101 of Regulation M and FINRA Rule 5190. The firm's WSPs did not provide for any supervisory reviews to ensure that FINRA Rule 5190 notifications were filed timely, and the firm conducted no reviews of whether its notifications were filed timely in compliance with FINRA Rule 5190. The firm later implemented a supervisory system and a written procedure to identify, and discipline persons responsible for, untimely filings of FINRA Rule 5190 notifications but conducted unreasonably narrow reviews of the accuracy of its notifications. In addition, the firm's WSPs did not provide for any supervisory reviews to monitor whether it purchased or bid for covered securities during applicable restricted periods. As a result, when the firm bid for and purchased certain covered securities as principal to cover errors, the firm failed to review those bids and purchases for compliance with Rule 101. In October 2022, the firm implemented supervisory reviews of bids and purchases in the firm's trading and error accounts for compliance with Rule 101. However, the firm has not yet established written procedures concerning those reviews. ([FINRA Case #2020068424201](#))

Penserra Securities, LLC ([CRD #145994](#), Orinda, California)

December 30, 2025 – An AWC was issued in which the firm was censured and fined \$40,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it sent trade confirmations to customers that failed to accurately disclose whether the price shown was an average price. The findings stated that approximately 38,000 trade confirmations the firm issued were inaccurate because they failed to disclose that the price identified was, in fact, an average price. These inaccuracies related to trades the firm executed for certain institutional customers, who requested that the firm combine price information from individuals, partial executions into an average price on the resulting confirmations. In addition, approximately 3,000 additional trade confirmations the firm issued in connection with single-execution, single-price transactions were inaccurate because they contained an average price disclosure, suggesting multiple executions. These inaccuracies were limited to trade confirmations generated by one business unit at the firm and resulted from outdated blotter codes embedded in a legacy order management system used to execute transactions through that specific unit. The findings also stated that the firm failed to reasonably supervise trade confirmation requirements for compliance. The firm's written procedures failed to provide details on the processes, parameters and documentation required when reviewing trade confirmations for accuracy and also failed to specify the frequency of those reviews. Further, the firm's written procedures did not require reviews that were sufficiently broad in scope to identify potential errors in reporting both single-execution and multiple-execution trades on the firm's different platforms. After FINRA notified the firm of the issues that are the subject of this AWC, the firm revised its supervisory system and procedures by, among other things, instituting new order entry procedures, adopting more detailed written procedures and providing staff training. ([FINRA Case #2023077017201](#))

VSI Securities, Inc. ([CRD #114419](#), Miami, Florida)

December 30, 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 willfully violated Section 17(a)(1) of the Securities Exchange Act of 1934 and Exchange Act Rule 17a-14 by failing to disclose its own disciplinary history in the firm's customer relationship summary (Form CRS). The findings stated that when the firm filed its initial Form CRS it failed to respond "Yes" to the question concerning legal and disciplinary history, even though the firm in fact had prior reportable legal or disciplinary history. In addition, the firm also omitted the required heading and conversation starters for Item 4 of the Form CRS. ([FINRA Case #2022073334701](#))

Standard Chartered Securities North America LLC ([CRD #130847](#), New York, New York)

December 31, 2025 – An AWC was issued in which the firm was censured and fined \$95,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to report to TRACE approximately 700 transactions in TRACE-eligible corporate debt securities within 15 minutes of the time of execution during an 18-month period. The findings stated that these transactions constituted approximately five percent of the firm's TRACE-eligible corporate debt transactions during that period. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to achieve compliance with TRACE reporting requirements. The firm's WSPs required the firm to conduct supervisory reviews for late TRACE reporting exceptions. However, although the firm identified and tracked late TRACE reports and escalated the late reports to supervisors, during the relevant period, the WSPs lacked

guidance on how to remediate TRACE reporting deficiencies. In addition, the firm had no system or procedure to address repeated TRACE reporting failures. Despite receiving communications from FINRA identifying TRACE reporting deficiencies, the firm did not timely address its deficiencies. Ultimately, the firm updated its supervisory system and procedures related to TRACE reporting and established a working group comprised of compliance, operations and other personnel to monitor the firm's TRACE reporting performance. The firm also implemented written procedures for tracking and escalating instances of late TRACE reporting. ([FINRA Case #2022074595301](#))

Individuals Barred

Douglas John McCauley ([CRD #1257811](#), Arlington, Vermont)

December 8, 2025 – An AWC was issued in which McCauley was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, McCauley consented to the sanction and to the entry of findings that he failed to provide information and documents requested by FINRA in connection with an investigation into his other business activities (OBAs). The findings stated that FINRA sought, among other items, information about McCauley's OBAs and bank and other financial records pertaining to those activities. After McCauley initially submitted a response that was incomplete did not provide all of the requested information and documents, he ultimately refused to provide the information or documents requested. ([FINRA Case #2025085574001](#))

William Klatoff Weinstein ([CRD #462058](#), Kilauea, Hawaii)

December 8, 2025 – An AWC was issued in which Weinstein was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Weinstein consented to the sanction and to the entry of findings that he failed to provide documents and information requested by FINRA during a matter that originated from its investigation of the Uniform Termination Notice for Securities Industry Registration (Form U5) filed by his member firm that stated that he was terminated for violations of its policies related to off-channel communications and systems access. ([FINRA Case #2025085169301](#))

Jennifer H. Ceterko ([CRD #3091599](#), Wayne, New Jersey)

December 9, 2025 – An AWC was issued in which Ceterko was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Ceterko consented to the sanction and to the entry of findings that she refused to provide documents and information and to appear for on-the-record testimony requested by FINRA in connection with its investigation into undisclosed OBAs, undisclosed private securities transactions, and whether she accessed the accounts of multiple of her former member firm customers while she was associated with a new firm. ([FINRA Case #2025084761001](#))

Eric A. Fiallo ([CRD #5123703](#), Miramar, Florida)

December 11, 2025 – An AWC was issued in which Fiallo was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Fiallo consented to the sanction and to the entry of findings that he refused to provide documents and information requested by FINRA in connection with its investigation into his potential involvement with borrowing from a customer. ([FINRA Case #2025086256001](#))

Brian Boyer Davis ([CRD #6762567](#), Tulsa, Oklahoma)

December 12, 2025 – An AWC was issued in which Davis was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Davis consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA. The findings stated that this matter originated from FINRA's review of amended Forms U5 filed by his former member firm. The firm filed an amended Form U5 disclosing that it initiated an internal review of Davis' potential involvement in a private securities transaction. Subsequently, the firm filed an additional amended Form U5 disclosing that Davis was subject to an investment-related, customer-initiated civil litigation. ([FINRA Case #2024083413502](#))

Ryan Wesley Davis ([CRD #5285713](#), Jenks, Oklahoma)

December 12, 2025 – An AWC was issued in which Davis was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Davis consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA during a matter originated from FINRA's review of amended Forms U5 filed by his former member firm. The findings stated that the firm filed an amended Form U5 disclosing that it initiated an internal review of Davis' potential involvement in a private securities transaction. Subsequently, the firm filed an additional amended Form U5 disclosing that Davis was subject to an investment-related, customer-initiated civil litigation. ([FINRA Case #2024083413501](#))

Richard Stanislaus Routie ([CRD #4379905](#), Orlando, Florida)

December 12, 2025 – An AWC was issued in which Routie was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Routie 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 whether he borrowed money from customers. ([FINRA Case #2023079368801](#))

Ali F. Chehab ([CRD #7625979](#), Portland, Oregon)

December 15, 2025 – An Office of Hearing Officers (OHO) decision became final in which Chehab was barred from association with any FINRA member in all capacities. The sanction was based on findings that Chehab failed to provide documents and information requested by FINRA during its investigation into whether he had made material misrepresentations to customers, engaged in unauthorized trading, and sold securities away from his member firm. The findings stated that FINRA requested Chehab provide copies of electronic communications and any settlement agreement with the complaining customer, his financial records, information about securities he recommended, and any undisclosed OBAs and private securities transactions. Chehab's failure to provide the requested documents and information prevented FINRA from fulfilling its regulatory mission. ([FINRA Case #2024082633901](#))

Ejiro Ode Okuma ([CRD #5774832](#), Lithia Springs, Georgia)

December 19, 2025 – An AWC was issued in which Okuma was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Okuma consented to the sanction and to the entry of findings that he refused to provide information and documents requested by FINRA in connection with its investigation into whether he converted funds of an elderly customer. ([FINRA Case #2025086347901](#))

Wilfredo Felix Jr. ([CRD #2693672](#), North Amityville, New York)

December 30, 2025 – A judgment of the U.S. Court of Appeals for the District of Columbia Circuit became final after a formal mandate was issued in accordance with the court's judgment issued September 18, 2025. The judgment denied Felix's petition for review and ordered that the motion to supplement the record be dismissed as moot in part and denied in part. Felix was barred from association with any FINRA member in all capacities for failing to comply with FINRA investigative requests for his former member firm's general ledger and annual audit. The sanction was based on the findings that Felix's failure to produce his former firm's annual audit and general ledger hampered FINRA's examination of the firm. ([FINRA Case #2020065128501](#))

Joseph Edward O'Shea Jr. ([CRD #2805483](#), Long Beach, New York)

December 31, 2025 – An AWC was issued in which O'Shea was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, O'Shea 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 an investigation into his potential excessive trading in his customers' accounts at his member firm. ([FINRA Case #2025084815601](#))

Individuals Suspended

Charles Jerry Lewis Jr. ([CRD #2495723](#), McGregor, Texas)

December 2, 2025 – An AWC was issued in which Lewis was fined \$10,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Lewis consented to the sanctions and to the entry of findings that he obtained reimbursement from his member firm's business-expense programs for fictitious expenses he had not incurred. The findings stated that at or near the year-end reimbursement deadlines for three years, Lewis submitted hundreds of claims to the business-expense programs that were below the \$75 threshold for required receipts and received reimbursement for at least \$657 of fictitious expenses he had not incurred. Lewis had generally incurred legitimate expenses in excess of the falsified claims for which he could have been reimbursed, but he had not reliably documented those expenses and thus did not submit them. After the firm's intervention, Lewis agreed to, and complied with, a requirement that he submit receipts to substantiate all expenses, even small expenses, which was a limitation in addition to the firm's standard requirements.

The suspension was in effect from January 5, 2026, through February 4, 2026. ([FINRA Case #2022075722901](#))

Roger Daniel Follis ([CRD #2653439](#), Washington, District of Columbia)

December 5, 2025 – An AWC was issued in which Follis was fined \$10,000 and suspended from association with any FINRA member in all capacities for 45 days. Without admitting or denying the findings, Follis consented to the sanctions and to the entry of findings that he caused his member firm to maintain incomplete books and records by sending business-related communications to a firm customer using a personal email account that was not disclosed to, or approved by, the firm. The findings stated that the emails included investment recommendations and information about the customer's portfolio investments and balances. Some emails contained complaints against Follis by the customer about activity in his account. In addition, on annual compliance questionnaires,

Follis reported to the firm that he had followed its policy requiring business-related emails to be transmitted through firm-approved email. Follis did not provide the firm copies of the messages, including the written customer complaints, for review or retention. As a result, the firm did not capture or preserve the emails as required.

The suspension is in effect from January 5, 2026, through February 18, 2026. ([FINRA Case #2024081461101](#))

Kyle Ray Critcher ([CRD #7351555](#), Charlotte, North Carolina)

December 10, 2025 – An AWC was issued in which Critcher was assessed a deferred fine of \$5,000, suspended from association with any FINRA member in all capacities for three months, and required to requalify by examination as a General Securities Representative (Series 7) prior to acting in that capacity with any FINRA member. Without admitting or denying the findings, Critcher consented to the sanctions and to the entry of findings that he contravened Section 17(a)(2) of the Securities Act of 1933, and thereby violated FINRA Rule 2010, by negligently misrepresenting that corporate bonds he recommended to two senior customers were Federal Deposit Insurance Corporation (FDIC) insured certificates of deposit. The findings stated that in recommending the customers purchase more than \$500,000 in corporate bonds, Critcher negligently misrepresented a material fact. Critcher claimed that the corporate bonds were insured by the FDIC even though he should have known the corporate bonds were not FDIC-insured. The corporate bond purchases factored into Critcher's compensation. Shortly after the purchases were made, the customers called Critcher's member firm and complained. The firm reversed the transactions and purchased certificates of deposit for the customers.

The suspension is in effect from December 15, 2025, through March 14, 2026. ([FINRA Case #2024083173801](#))

Paul Richard Meyer ([CRD #3062534](#), Edina, Minnesota)

December 10, 2025 – An AWC was issued in which Meyer was fined \$5,000 and suspended from association with any FINRA member in all capacities for six weeks. Without admitting or denying the findings, Meyer consented to the sanctions and to the entry of findings that he exercised discretion without written authorization in connection with trades in customer accounts. The findings stated that although Meyer generally discussed trading with the customers, his member firm did not designate their accounts as discretionary and Meyer did not speak with the customers on the dates of the transactions.

The suspension is in effect from January 5, 2026, through February 16, 2026. ([FINRA Case #2023078776201](#))

Sam Calvin Nevels ([CRD #5319860](#), Memphis, Tennessee)

December 11, 2025 – An AWC was issued in which Nevels was fined \$10,000 and suspended from association with any FINRA member in all capacities for four months. Without admitting or denying the findings, Nevels consented to the sanctions and to the entry of findings that he, in anticipation of leaving his member firm for a new firm, improperly took confidential and proprietary information from his firm's systems, including nonpublic information about the firm's customers. The findings stated that Nevels sent unencrypted emails to his personal email address. These emails contained,

among other things, institutional client information, including contact lists generated from the firm's customer contact system, presentations made to customers, and details of transactions that customers were considering. Nevels also printed and retained documents and retained five photographs of information on the firm's computer system screens and four screen shots of firm emails, three containing clients contact information and one with details of a firm investment product. Furthermore, Nevels and another registered representative who left the firm with him, gathered and removed confidential and proprietary information from the firm, including materials created by other firm employees. Nevels' actions violated the firm's policies and internal ethics and compliance standards. The findings also stated that Nevels caused his firm to maintain inaccurate books and records by falsifying information in the firm's contact management system. Nevels changed client contact data, which caused inaccuracies in the firm's contact management system and could have made it more difficult for the firm to reach out to the clients before the departing representatives had a chance to contact them. In each instance where Nevels changed a client's contact information, the new information was incorrect.

The suspension is in effect from January 5, 2026, through May 4, 2026. ([FINRA Case #2023079997001](#))

Christopher Cacace ([CRD #4308782](#), Rockville Centre, New York)

December 15, 2025 – An OHO decision became final in which Cacace was fined \$5,000, suspended from association with any FINRA member in any supervisory capacities for 30 business days, and required to requalify by examination as General Securities Principal (Series 24) prior to assuming any principal responsibilities. The sanctions were based on the findings that Cacace failed to fulfill his supervisory responsibility to reasonably respond to red flags of excessive trading by four registered representatives at his member firm. The findings stated that Cacace had limited, shared supervisory responsibilities and consequently, was obligated to take reasonable and appropriate steps to ensure that appropriate action was taken to address the many red flags of broker misconduct he encountered at the firm. The hearing panel found that while there was evidence that Cacace initially and occasionally attempted to persuade the firm co-owners to address the excessive trading, his efforts were insufficient. When Cacace was thwarted by the firm owners, and saw that the firm's management would not act, he did not take sufficient action to address the problem.

The suspension is in effect from December 15, 2025, through January 28, 2026. ([FINRA Case #2020065599103](#))

Keith Michael Dagostino ([CRD #2837860](#), Oyster Bay Cove, New York)

December 17, 2025 – An AWC was issued in which Dagostino was assessed a deferred fine of \$25,000 and suspended from association with any FINRA member in all capacities for 24 months. Without admitting or denying the findings, Dagostino consented to the sanctions and to the entry of findings that he willfully violated the Care Obligation under Reg BI when he recommended that retired and senior investors purchase speculative and low-priced securities that were not in their best interests. The findings stated that Dagostino recommended that the customers purchase speculative low-priced securities from microcap issuers. Each customer had a low risk tolerance and investment objectives of preserving capital and generating income for retirement. Dagostino's recommendations to these customers caused over \$1.8 million in losses. Dagostino's member firm repaid the customers for the losses they realized as a result of his recommendations.

The suspension is in effect from January 5, 2026, through January 4, 2028 ([FINRA Case #2022075471001](#))

Charles Henry Garrido ([CRD #1191231](#), Chicago, Illinois)

December 17, 2025 – An AWC was issued in which Garrido fined \$10,000 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Garrido consented to the sanctions and to the entry of findings that he exercised discretion in customer accounts without written authorization with approximately 2,500 trades in over 200 customer accounts. The findings stated that while the customers understood Garrido was conducting trading in their accounts, none had given him prior written authorization, and his member firm had not accepted the accounts as discretionary. On each of his firm’s annual compliance questionnaires, Garrido inaccurately stated that he did not exercise discretion in customer accounts. The findings also stated that Garrido sent text messages related to his securities business that were not retained by his firm. The text messages included, among other things, investment recommendations as well as information about specific trades, brokerage account performance and balances, transfers of funds, issuers, and market events. Garrido did not provide copies of those text messages to the firm, which caused his firm to maintain incomplete records of business communications.

The suspension is in effect from January 20, 2026, through April 19, 2026. ([FINRA Case #2023077059102](#))

William Noel Girasole ([CRD #6840837](#), Islip, New York)

December 23, 2025 – An AWC was issued in which Girasole was fined \$5,000 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying the findings, Girasole consented to the sanctions and to the entry of findings that he forged the electronic signatures of five customers and three registered representatives on a total of six life insurance applications. The findings stated that the representatives and customers did not authorize Girasole to sign these applications on their behalf. The insurance provider canceled the six applications before the customers were charged any premiums.

The suspension is in effect from January 20, 2026, through March 19, 2026. ([FINRA Case #2023079527501](#))

Ronald Ray Botello ([CRD #4809045](#), San Antonio, Texas)

December 29, 2025 – An AWC was issued in which Botello 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, Botello consented to the sanctions and to the entry of findings that he borrowed a total of \$173,000 from two of his customers, who were senior retail investors, without providing notice to or obtaining approval from his member firm. The findings stated that Botello used the borrowed funds to make a payment in connection with a personal investment. Botello had a personal friendship with each customer, but neither was a member of his immediate family. The loans were undocumented and did not include any interest payments. Subsequently, Botello repaid both loans in full.

The suspension is in effect from January 5, 2026, through April 4, 2026. ([FINRA Case #2025085326301](#))

David John Taddeo ([CRD #1163829](#), El Cajon, California)

December 30, 2025 – An AWC was issued in which Taddeo was assessed a deferred fine of \$7,500 and suspended from association with any FINRA member in all capacities for four months. Without admitting or denying the findings, Taddeo consented to the sanctions and to the entry of findings that he participated in private securities transactions with three customers who invested a total of \$255,000, without providing prior written notice to his member firm. The findings stated that Taddeo participated in the private securities transactions by introducing customers to the investment opportunity, providing information regarding the company to the customers, and, assisting two customers with liquidating investments in their brokerage accounts at the firm to generate the funds for the investment. Taddeo did not receive any commission or other remuneration in exchange for his customers' investments. Taddeo falsely attested on annual compliance questionnaires that he had not offered, issued, or participated in private securities transactions or promissory notes outside of his firm and that he understood he could not direct customers and non-customers to investments not approved by his firm. The findings also stated that Taddeo settled complaints of two customers who invested in the private securities transactions, without the knowledge or consent of his firm. Taddeo personally repaid the two customers the amount of their original investment in the promissory notes. Taddeo falsely attested on annual compliance questionnaires that he had not settled customer complaints away from the firm. Taddeo's firm learned of the customer complaints and Taddeo's settlements when the third customer to whom Taddeo sold the promissory note complained in writing.

The suspension is in effect from January 5, 2026, through May 4, 2026. ([FINRA Case #2024081095602](#))

Guy Patrick Young ([CRD #7333176](#), Baltimore, Maryland)

December 30, 2025 – An AWC was issued in which Young was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Young consented to the sanctions and to the entry of findings that he improperly shared photos of confidential data taken on his personal cell phone with individuals not affiliated with his member firm. The findings stated that Young sent text messages to friends that showed customers' nonpublic personal information, including client names, account balances, account numbers, dates of birth, employer, and other background information. Young disclosed this information without the knowledge or consent of the customers or the firm and in contravention of firm's policies and procedures.

The suspension was in effect from January 5, 2026, through February 4, 2026. ([FINRA Case #2024081159702](#))

Justin A. Parker ([CRD #4671557](#), St. Charles, Illinois)

December 31, 2025 – An AWC was issued in which Parker was censured, fined \$2,500, and suspended from association with any FINRA member in all capacities for 30 days. In determining the appropriate sanctions in this matter, FINRA considered, among other factors, that Parker's member firm fined him \$2,500 for the misconduct at issue in this AWC. Without admitting or denying the

findings, Parker consented to the sanctions and to the entry of findings that he instructed a trader to effect 310 unauthorized transactions in the non-discretionary accounts of 277 customers by tendering the customers' shares in a company to participate in the company's modified "Dutch Auction" self-tender offer. The findings stated that Parker did not have discretionary authority over any of the accounts. No customers complained, and Parker received no commissions for the transactions.

The suspension is in effect from January 20, 2026, through February 18, 2026. ([FINRA Case #2022076380901](#))

Complaint Filed

FINRA issued the following complaints. Issuance of a disciplinary complaint represents FINRA's initiation of a formal proceeding in which findings as to the allegations in the complaint have not been made, and does not represent a decision as to any of the allegations contained in the complaint. Because these complaints are unadjudicated, you may wish to contact the respondents before drawing any conclusions regarding these allegations in the complaint.

Spartan Capital Securities, LLC ([CRD #146251](#), New York, New York), **Frederick Joseph Cammarano III** ([CRD #2277307](#), Staten Island, New York), **Michael A. Darvish** ([CRD #3243141](#), Great Neck, New York), **Kim Marie Monchik** ([CRD #2528972](#), Hazlet, New Jersey), **James Robert Pecoraro** ([CRD #2440231](#), Huntington, New York) and **John Joseph Stapleton** ([CRD #2791194](#), Lido Beach, New York)

December 15, 2025 – The firm, Cammarano, Darvish, Monchik, Pecoraro, and Stapleton were named as respondents in a FINRA complaint alleging for more than four years, the firm defrauded customers by engaging in widespread churning, generating millions in revenue and causing customers millions in harm. The complaint alleges that the firm, Pecoraro, and Stapleton willfully violated Section 10(b) of the Exchange Act and Exchange Act Rule 10b-5 by churning customer accounts. The firm, Pecoraro, and Stapleton, acting through themselves and through other firm representatives exercised de facto control over the trading in the customer accounts. They controlled the volume and frequency of trading in the accounts, decided what securities to buy and sell, the quantity of each transaction, and the timing of each transaction. The customers relied on them to make recommendations and routinely followed the recommendations. The firm, Pecoraro, Stapleton, acting through themselves and other representatives, acted with scienter and acted with intent to defraud, or at a minimum, with reckless disregard of the interests of the customers. The complaint also alleges that the firm, Darvish, and Pecoraro recommended trading that was excessive and quantitatively unsuitable in light of the customers' investment profiles, as evidenced by the high cost-to-equity ratios and turnover rates, the frequency of the transactions, and the transaction costs incurred. The complaint further alleges that the firm, Darvish, Pecoraro, and Stapleton willfully violated Reg BI by failing to act in the best interest of the customers at the time the recommendations were made. The recommended series of securities transactions were excessive and not in the best interest of the customers and placed the financial or other interests of the firm and its representatives ahead of the customers' interests. In addition, Darvish, Pecoraro, and Stapleton failed to exercise reasonable diligence, care, and skill to have a reasonable basis to believe

that the series of securities transactions recommended to the customers were not excessive; were in the customers' best interests taken in light of their investment profile and the potential risks, rewards, and costs associated with the recommendations; and did not place the firm's or its representatives' financial or other interests ahead of the customers' interests. In addition, the complaint alleges that the firm, Cammarano, and Monchik failed to reasonably investigate and address the red flags of excessive trading and churning and failed to reasonably supervise Pecoraro's and Stapleton's willful violations of Section 10(b) of the Exchange Act. The firm, Cammarano, and Monchik had an obligation to reasonably investigate and follow up on red flags indicating that the firm's representatives were engaged in potentially excessive trading and churning. ([FINRA Case #2018056490335](#))

Firms Suspended for Failure to Provide Information or Keep Information Current Pursuant to FINRA Rule 9552 (The date the suspension began is listed after the entry. If the suspension has been lifted, the date follows the suspension date.)

Dealer Solutions North America LLC (CRD #286268)

New York, New York
(December 8, 2025)

Fundit, Inc (Funding Portal Org ID #304126)

Fairfield, New Jersey
(September 18, 2025 – December 18, 2025)
FINRA Case #2025083795301

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.)

Lauren Elizabeth Durand (CRD #7981774)

Kent, Washington
(December 8, 2025)
FINRA Case #2025086446301

Christian Yavier Gomez (CRD #5740603)

Cedar Hill, Texas
(December 15, 2025)
FINRA Case #2025086269701

Angela Danee Maynard (CRD #4262358)

Ceredo, West Virginia
(December 2, 2025)

FINRA Case #2024082714101

Richard James Wick (CRD #6248114)
Bigfork, Montana
(December 22, 2025)
FINRA Case #2025085722701

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.)

Jeremy Matthew Benson (CRD #6249020)

San Antonio, Texas
(December 8, 2025)
FINRA Case #2024081430901

Nafissa Diallo (CRD #7169648)

Glenarden, Maryland

(December 15, 2025)

FINRA Case #2024080970901

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

(December 2, 2025)

FINRA Arbitration Case #24-00987

Federico Cardona (CRD #6170765)

Guaynabo, Puerto Rico

(September 30, 2025 – December 2, 2025)

FINRA Case #20250869608/ARB250017/Arbitration Case #23-03265

Elmer Richard Ferguson (CRD #4249474)

San Bruno, California

(December 24, 2025)

FINRA Case #20250868153/Arbitration Case #19-03417/ARB250016

James Edward McArthur (CRD #2797856)

Mount Sinai, New York

(December 2, 2025)

FINRA Arbitration Case #24-00987

Jonathan J. Tuoti (CRD #5335673)

Gilbert, Arizona

(October 3, 2012 – December 30, 2025)

FINRA Arbitration Case #11-04072

Gino Wang (CRD #5744650)

Corona, California

(December 3, 2025)

FINRA Arbitration Case #25-01329

Taiwo Wiley (CRD #5638478)

Los Angeles, California

(December 29, 2025)

FINRA Arbitration Case #24-00197

Press Releases

FINRA Orders Securities America to Pay \$2 Million in Restitution to Customers, Fines Firm \$1 Million for Mutual Fund Supervision Failures

Firm Failed to Reasonably Supervise Recommendations That Customers Switch Between Mutual Fund Families or Sell Class A Mutual Funds Shortly After Purchasing Them

FINRA has ordered [Securities America, Inc.](#) to pay \$2 million in restitution to its customers and has fined the firm \$1 million for failing to reasonably supervise Class A mutual fund recommendations, resulting in customers paying unnecessary fees through recommendations that were potentially unsuitable or not in customers' best interest.

"Firms have a fundamental obligation to supervise their representatives' recommendations and ensure they serve their customers' best interests," said Bill St. Louis, Executive Vice President and Head of Enforcement at FINRA. "When firms fail to supervise mutual fund recommendations, investors pay the price through unnecessary fees and charges. This \$2 million in restitution will make affected customers whole, but prevention should always be the priority."

Between January 2018 and June 2024, when it became part of Osaic Wealth, Inc., Securities America effected the purchase of approximately \$3.8 billion in Class A mutual fund shares, which generated a substantial portion of the firm's revenue. Nonetheless, the firm failed to implement a system, including written policies and procedures, reasonably designed to supervise recommendations of Class A shares for compliance with FINRA Rule 2111 (Suitability) and Regulation Best Interest's Care Obligation. The Care Obligation requires broker-dealers and associated persons to exercise reasonable diligence, care and skill when making recommendations to retail customers.

Securities America's supervisory system was not reasonably designed to detect switches and short-term sales. Even when the firm identified such trades, the firm failed to reasonably review them to ensure that representatives had reasonably considered fees and commissions. As a result, the firm failed to reasonably supervise recommendations of more than 1,000 Class A mutual fund switches and more than 2,000 short-term sales that were potentially unsuitable or not in the customer's best interest. Collectively, these trades caused customers to pay \$2,019,040 in commissions and fees, which will now be returned to them. This matter originated from a FINRA cycle examination.

Mutual funds offer different share classes, each with its own fee structure. Class A mutual fund shares typically collect a front-end sales charge when purchasing the fund, but this fee is typically waived when a customer exchanges a mutual fund for a new fund within the same fund family. Class C shares, by contrast, charge higher ongoing annual fees than Class A shares but typically have no upfront load.

When a representative recommends switching from one fund family to another, the customer pays a new front-end sales charge on Class A shares—a cost that could be avoided by staying within the

original fund family. Similarly, selling a Class A mutual fund shortly after buying it creates a risk that a customer has paid an upfront fee without holding the investment long enough to benefit from it.

In settling [this matter](#), Securities America consented to the entry of FINRA's findings, without admitting or denying the charges.

FINRA Orders American Portfolios Financial Services to Pay \$4.6 Million in Restitution for Overcollection of Fees, Retention of Surplus Interest

Firm Failed to Accurately Calculate Bank Deposit Program Fees and Failed to Disclose Retention of Surplus Interest Earned from Customers' Funds

FINRA has ordered [American Portfolios Financial Services, Inc.](#) (APFS) to pay \$4.6 million in restitution to customers impacted by the firm's inaccurate representation of how it calculated its fees and its retention of undisclosed, surplus interest. The fees and surplus interest were earned from customers' funds in the firm's bank deposit program between April 2018 and September 2022. The firm was also fined \$550,000 for the violations.

Bank deposit programs allow broker-dealers to automatically transfer customers' uninvested cash balances from their brokerage accounts into interest-bearing, Federal Deposit Insurance Corporation-insured bank accounts. These programs are designed to help customers earn interest on cash that might otherwise sit idle. During the period at issue, APFS enrolled approximately 85,000 customers in its bank deposit program.

From April 2018 through September 2022, APFS provided customers with inaccurate disclosures about how it calculated per-account fees for customers enrolled in its bank deposit program. Rather than using a formula tied to the Federal Funds Target rate, as stated in the disclosures, APFS first determined customer yields based on factors such as the rates paid by its competitors and retained the remaining interest paid by the participating banks, less other administrative fees, as its fee. Over the entire relevant period, APFS collected more than \$3 million in aggregate fees beyond what the disclosed formula would have yielded.

APFS also did not disclose that it retained surplus interest—totaling approximately \$1.25 million—when interest rate changes created excess proceeds. Finally, APFS incorrectly credited the retained excess administrative fees and surplus interest as revenue in its net capital calculation, resulting in the firm filing inaccurate monthly reports with FINRA.

"While bank deposit programs may offer useful features to customers, it is important for firms to ensure compliance with a range of relevant FINRA and SEC rules," said Bill St. Louis, Executive Vice President and Head of FINRA Enforcement at FINRA. "Firms must ensure accuracy in customer communications, including how fees are calculated and what interest customers will earn. When firms fail in that obligation—whether through inaccurate formulas, undisclosed interest retention or

inadequate supervisory controls—customers can suffer real financial harm, as demonstrated by the substantial restitution required in this case."

From April 2018 to May 2023, APFS lacked a system reasonably designed to supervise the bank deposit program. APFS had no supervisory system, including written procedures, to ensure that the customer disclosures accurately communicated all material information about the bank deposit program or that the firm calculated its fees in accordance with disclosures sent to its customers.

APFS was acquired by Osaic Holdings, Inc. in November 2022, and was merged into Osaic Wealth, Inc. in October 2024. The fine imposed in this matter reflects that Osaic provided substantial assistance to FINRA in calculating the appropriate restitution, that APFS disclosed the underpayments to FINRA in October 2022, at which time it began applying the disclosed formula to calculate its fee, and that Osaic began paying restitution to affected customers before the settlement in this matter was finalized.

In settling [this matter](#), APFS consented to the entry of FINRA's findings, without admitting or denying the charges.
