Disciplinary and Other FINRA Actions

Reported for July 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

Liquidnet, Inc. (CRD #103987, New York, New York)
May 4, 2026 – A Letter of Acceptance, Waiver and Consent (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 published inaccurate monthly reports of executions of covered orders in National Market System (NMS) securities required under Regulation NMS Rule 605 of the Securities Exchange Act of 1934 (Exchange Act). The findings stated that the firm erroneously included in its Rule 605 reports approximately 67 million orders that required special handling because the firm incorrectly classified those orders as covered orders, which caused the reports to contain inaccurate order and execution quality statistics. FINRA identified these inaccuracies during an exam in March 2023. By April 2024, the firm implemented coding fixes for the erroneously classified orders and no longer reported them in the firm's Rule 605 reports. The findings also stated that the firm's supervisory system, including its written supervisory procedures (WSPs), was not reasonably designed to achieve compliance with Rule 605. The firm's supervisory system was unreasonable because the firm had no procedures and no supervisory process to determine whether orders were properly classified as covered orders. By April 2024, the firm had updated its WSPs and implemented supervisory reviews addressing the proper classification of orders as covered orders. (FINRA Case #2023077018401)

Oppenheimer & Co. Inc. (CRD #249, New York, New York)
May 4, 2026 – An AWC was issued in which the firm was censured, fined $250,000, 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 its customer account statements contained inaccurate and misleading information concerning collateralized mortgage obligations (CMOs) issued by private entities (private label CMOs). The findings stated that the firm generated

and sent an estimated 150,000 account statements to more than 800 customers that miscategorized all private label CMOs in each customer's account under the heading "Government Agency Bonds." Categorizing private label CMOs as government agency bonds was inaccurate and misleading because it suggested that the CMOs were guaranteed by the U.S. government or a government-sponsored entity. After being advised by FINRA of the inaccuracies, the firm tried to address the issue by changing the categorization of private label CMOs in customer account statements from "Government Agency Bonds" to "Corporate Bonds." However, this characterization was inaccurate because private label CMOs differ from corporate bonds in several respects. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to review the accuracy of customer account statements. Although the firm's WSPs required firm personnel to conduct a bi-monthly review of a sample of customer account statements, the review primarily focused on the accuracy of numerical values reported in the statements and did not include any review to determine whether customer holdings were accurately categorized. The firm failed to detect that private label CMOs were inaccurately categorized as government agency bonds and corporate bonds in customer account statements. (FINRA Case #2023077058901)

Infinity Financial Services (CRD #144302, Oakland, California)
May 5, 2026 – An AWC was issued in which the firm was censured, fined $25,000, ordered to pay $25,436, jointly and severally, in restitution to customers, and required to comply with the undertaking enumerated in this AWC. A lower fine was imposed after considering, among other things, the firm's revenue and financial resources. 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 surveil rates of deferred variable annuity exchanges. The findings stated that the firm did not establish or maintain any procedures explaining how to surveil its registered representatives' deferred variable annuity exchange rates, including who was responsible for such surveillance, how often it would take place, what tools to use to conduct the surveillance, and what parameters to consider when evaluating whether exchange rates were inappropriate. In practice, the firm did not maintain any system for tracking rates of deferred variable annuity exchanges and no review was conducted to monitor registered representatives' exchange rates. The findings also stated that the firm failed to reasonably supervise one registered representative's deferred variable annuity exchange and purchase recommendations. The representative recommended 10 deferred variable annuity exchanges to nine of the firm's customers and also recommended that two other customers purchase deferred variable annuities, without having a reasonable basis to believe the recommendations were suitable. The firm failed to detect that the representative inaccurately stated the costs, fees, and share classes of the proposed annuities. The firm approved the exchanges and purchase recommendations without identifying these red flags or satisfying its obligations under FINRA Rule 2330(c). As a result of the representative's unsuitable recommendations, the customers collectively paid $25,436 in additional costs. (FINRA Case #2020065124802)

IFP Securities, LLC (CRD #297287, Tampa, Florida)
May 7, 2026 – 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 violated the Care Obligation of Rule 15l-1 of the Exchange Act (Reg BI) by failing to reasonably supervise recommendations in mutual funds and Unit Investment Trusts (UITs) and failing to

maintain and enforce written policies and procedures that were reasonably designed to achieve compliance with Reg BI. The findings stated that as of November 2022, the firm changed vendors for its automated surveillance system. As an unintended consequence of that change, the firm's system did not work properly to generate alerts when mutual funds were sold close in time to a purchase or purchased close in time to a sale, and when a UIT was sold before maturity or purchased close in time to a sale. Once the firm became aware that its surveillance system was not working as intended, it worked with its vendor to fix the system. However, the system was not functional until 2025. During the period while the alerts were not working correctly, the firm did not have an alternative supervisory system in place to review for recommendations of switching and short-term trading in mutual funds and UITs. As a result, the firm failed to review mutual fund and UIT transactions to evaluate whether the recommendations were in its customers' best interest. This included transactions where a customer sold a mutual fund and reinvested some or all of the proceeds into another mutual fund or sold a mutual fund a short time after purchase, and transactions where a customer sold a UIT and rolled some or all of the proceeds into another UIT or sold a UIT prior to maturity, including a short time after purchase. (**FINRA Case #2023077036901**)

Moody Capital Solutions, Inc. (CRD #15989, Alpharetta, Georgia)
May 7, 2026 – 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 failed to establish, maintain, and enforce a supervisory system, including WSPs, reasonably designed to achieve compliance with FINRA rules governing outside business activities (OBAs) and outside securities accounts. The findings stated that the firm did not evaluate at least 23 disclosed OBAs identified by FINRA's review. Specifically, the firm did not evaluate whether each proposed OBA would interfere with or otherwise compromise the registered person's responsibilities to the firm or firm's customers, or be viewed by customers or the public as part of the firm's business; if it should be subject to specific conditions or limitations or prohibited; or if it should be characterized as an OBA or treated as an outside securities activity. The firm also failed to document an evaluation of the factors in FINRA Rule 3270.01 for each of these OBAs. In addition, the firm's associated persons maintained at least 34 outside accounts. Based on FINRA's review of a sample of 19 accounts, the firm did not obtain or maintain evidence of having obtained any account statements for six accounts and did not obtain or maintain evidence of having obtained certain account statements for 12 accounts. The firm did not document reviews of account statements. The firm has updated its supervisory system, including its WSPs, related to outside securities accounts. The findings also stated that the firm's anti-money laundering (AML) program was not reasonably designed to achieve compliance with Customer Identification Program (CIP) and Customer Due Diligence (CDD) requirements. The firm was engaged in investment banking business, including acting as a placement agent for private offerings of small-cap issuers but did not establish and implement reasonably designed procedures to verify the identity of its customers, or to identify and verify the identity of the beneficial owners of its legal entity customers. The findings also included that the firm failed to conduct AML testing. The firm was required to provide for an independent AML test on an annual basis. However, the firm did not conduct independent testing of its AML program for the calendar years from 2020 through the present. (**FINRA Case #2022073261701**)

World Investments, LLC (CRD #20626, Lincroft, New Jersey)
May 18, 2026 – 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 failed to reasonably supervise deferred variable annuity exchanges. The findings stated that the firm recommended over 150 deferred variable annuity exchanges, most of which customers funded by surrendering an existing deferred variable annuity product. The firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to comply with Reg BI and supervise recommendations of exchanges of deferred variable annuities. To the contrary, the firm's supervisory system and WSPs were not reasonably designed to provide to principals information necessary to assess the suitability of deferred variable annuity exchanges or to determine whether such transactions were in the customers' best interests. The standardized annuity exchange form that the firm used did not elicit all facts necessary to determine whether an exchange was suitable, such as surrender charges, existing mortality and expense fees, charges for riders or other product enhancements, benefits that would be lost through the exchange, and whether the customer had transacted in another deferred variable annuity exchange within the preceding 36 months. As a result of these supervisory deficiencies, registered representatives recommended, and principals approved, over 50 deferred variable annuity exchanges without information required to be considered by FINRA Rule 2330 and Reg BI and without any evidence that anyone had attempted to consider that information. Furthermore, the firm failed to implement surveillance procedures to surveil for rates of effecting deferred variable annuity exchanges that raise for review whether such rates of exchanges evidence conduct inconsistent with FINRA Rule 2330, other applicable FINRA rules, or the federal securities laws. The firm did not conduct any surveillance of deferred variable annuity exchange rates during the relevant period. Instead, for surveillance purposes, the firm relied primarily on the transaction-by transaction approvals by principals. Those principals, however, neither calculated nor reviewed the aggregate rates of deferred variable annuity exchanges by individual registered representative. In addition, the firm's WSPs failed to provide guidance on: (1) what level of exchange rates or types of patterns required further review and (2) what steps should be taken if the firm detected inappropriate rates or patterns of deferred variable annuity exchanges. Consequently, the firm failed to identify at least two representatives who recommended deferred variable annuity exchanges at exceptionally high rates, which should have prompted further investigation. The findings also stated that the firm failed to reasonably supervise registered index-linked annuity (RILA) recommendations. The firm's policies and procedures were not reasonably designed or adequately tailored to address the specific risks and costs inherent in RILA purchases and exchanges. As a result of these deficiencies, supervisors approved recommendations to purchase or exchange RILAs without considering information critical to determining whether the recommendations were in customers' best interests. In fact, in a majority of the firm's RILA recommendations, a supervisor approved the transaction without considering the customer's investment profile, including the customer's net worth, financial needs, investment objectives, knowledge, and experience, investment time horizon, risk tolerance, and other investments, even though the firm collected this information. In addition, although the firm's WSPs required an annual compliance review of all RILA recommendations, the firm failed to conduct any such review during the relevant period. (FINRA Case #2023077037801)

Dinosaur Financial Group, L.L.C (CRD #104446, New York, New York)
May 19, 2026 – 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 failed to provide FINRA with the required prior written notice of a lease guarantee arrangement and did not disclose its existence until after FINRA initiated a cycle examination. The findings stated that that the firm's parent company entered into a 10-year commercial real estate lease for office space totaling $4,383,225, with certain amounts prepaid. That same month, as part of the lease arrangement, the firm entered into a guarantee agreement with the lessor, whereby the firm guaranteed all of the "terms, covenants, conditions, obligations and agreements contained in the" lease, including an "unconditional guarantee" of "the rent, additional rent and other charges payable under the" lease. The findings also stated that the firm conducted a securities business while net capital deficient for 19 months and failed to timely file notifications of such deficiencies. The firm was required to include the lease guarantee it provided to its parent company as a liability when calculating its net capital and aggregate indebtedness but failed to do so. As a result, the firm failed to maintain its required minimum net capital with the largest deficiency being $2,905,172, and the average deficiency of $1,450,162. The firm's parent company terminated the existing lease and executed a new lease that included the parent company as guarantor. The firm maintained its required minimum net capital thereafter. In addition, the firm failed to file a notification advising FINRA and the Securities and Exchange Commission (SEC) that its net capital was less than 120% of its required minimum net capital. The firm also failed to file the required same-day notification to FINRA and the SEC when it first became net capital deficient. The firm did not disclose this deficiency, which lasted from May 2022 to November 2023, until March 2024, several months after becoming aware of it. The findings also included that the firm failed to make and preserve accurate books and records and filed inaccurate Financial and Operational Combined Uniform Single (FOCUS) reports. The firm incorrectly calculated its net capital and aggregated indebtedness by failing to account for the firm's guarantee of its parent company's lease. These errors caused inaccurate books and records, including inaccurate net capital computations, concerning the firm's net capital position and aggregate indebtedness. These erroneous calculations were used in 20 FOCUS reports. As a result, the FOCUS reports were inaccurate and misstated the firm's net capital, excess net capital, and aggregate indebtedness. The firm's recordkeeping errors and inaccurate financial filings hindered regulatory monitoring of the firm's financial condition. (**FINRA Case #2023077098201**)

BCP Securities, Inc. (CRD #27063, Greenwich, Connecticut)
May 22, 2026 – 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 from December 2018 to April 2024, it published approximately 300 equity research reports when its membership agreement did not permit it to publish equity research reports. The findings stated that by publishing equity research reports, the firm implemented a material change in its business operations. The firm did not seek or obtain approval from FINRA to publish equity research reports. In September 2025, FINRA granted approval for the firm to engage in publishing equity research reports. The findings also stated that the firm permitted four individuals to perform research activities requiring registration as a Research Analyst or Research Principal when they were not registered with FINRA in either of those capacities. All four individuals were primarily responsible for the preparation of the substance of one or more of approximately 300 equity research reports, and one or more of their names appeared on those research reports. During the same period, three

of those four individuals were responsible for reviewing and supervising the preparation of those research reports when they were not registered as Research Principals. Subsequently, two of the four individuals became registered in the necessary capacities and two are no longer associated with the firm. The findings also included that the firm's supervisory system and WSPs were not reasonably designed to achieve compliance with FINRA's registration requirements. The firm's procedures did not address when or how supervisors should determine whether individuals participating in research activities required registration as a Research Analyst or Research Principal, or any procedures for escalation or follow up if a missing registration was identified. Due to the absence of such procedures, the firm failed to take reasonable steps to determine whether the individuals participating in the firm's research activities were appropriately registered. (**FINRA Case #2023077062701**)

tastytrade, Inc. fka tastyworks, Inc. (CRD #277027, Chicago, Illinois)
May 29, 2026 – An AWC was issued in which the firm was censured and fined $200,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to report to FINRA accurate statistical and summary information regarding written customer complaints. The findings stated that the firm received, but failed to report, at least 71 written customer complaints. The findings also stated that the firm failed to establish, maintain, and enforce a supervisory system, including WSPs, reasonably designed to achieve compliance with FINRA Rule 4530(d). The firm required its personnel to escalate "grievances" to the firm's compliance department to determine whether such grievances were reportable under Rule 4530(d). However, the firm's training and procedures, including WSPs, did not include specific factors that firm representatives or their supervisors should consider in determining whether escalation was warranted. The firm ultimately revised its training and guidance regarding the identification of complaints required to be reported by Rule 4530(d) and included factors that should be considered in determining whether escalation is warranted. (**FINRA Case #2020068991101**)

Firm Sanctioned

Cape Securities Inc. (CRD #7072, McDonough, Georgia)
May 8, 2026 – An AWC was issued in which the firm was censured and ordered to pay $145,072.62, plus interest, in partial restitution to customers. FINRA did not impose a fine after it considered, among other things, the firm's revenues and financial resources, its Uniform Request for Broker-Dealer Withdrawal (Form BDW) filing requesting to terminate its registration with FINRA, and its agreement to pay restitution. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it willfully violated Exchange Act Rule 15l-1(a)(1) by failing to establish and maintain written policies and procedures, and a supervisory system, reasonably designed to achieve compliance with Reg BI. The findings stated that the firm's policies and procedures discussed Reg BI only in general terms, without prescribing procedures for complying with the Care Obligation. The firm failed to establish, maintain, and enforce written policies and procedures reasonably designed to achieve compliance with Reg BI with respect to recommendations of complex products to retail customers. The findings also stated that the firm failed to reasonably supervise its registered representatives' recommendations to purchase speculative corporate bonds and non-traditional exchange-traded products (NT-ETPs) for

compliance with Reg BI. The firm did not provide guidance to supervisors for determining whether a representative had a reasonable basis to believe that a recommendation to purchase an alternative product was in a customer's best interest, nor did the firm provide reasonable guidance for determining whether such a recommendation was consistent with the customer's profile. Two firm representatives recommended that six retail customers purchase a total of $460,000 of corporate bonds. All six of the customers had a moderate risk tolerance and investment objectives that did not include speculation, and five of the six customers were seniors. Despite red flags that the high risk of loss associated with speculative investments in the corporate bonds may not have been consistent with these customers' profiles, supervisors took no steps to confirm that the representatives had a reasonable basis for these recommendations. In addition, another representative recommended that four retail customers purchase and hold for longer than a day approximately $45,000 in daily reset NT-ETPs that were designed to return three times the return of the benchmark they tracked. The firm's assigned supervisor took no steps to determine whether the representative had a reasonable basis to believe the recommendations were in the customers' best interest given their age and risk tolerance. The firm also failed to determine whether the representative understood the NT-ETPs he recommended, or whether the recommendations to hold the products for more than a single day were in the best interests of his customers given the NT-ETPs' daily reset feature. Based on the representative's recommendations, the four retail customers held the daily-reset NT-ETPs for periods ranging from 253 to 693 days and incurred $15,072.62 in realized losses. The findings also included that the firm failed to timely respond to eight requests for documents and information requested by FINRA. On numerous occasions, the firm failed to provide timely responses to those requests, and missed multiple deadlines without requesting extensions, which materially delayed resolution of this matter. (**FINRA Case #2021069370604**)

Individuals Barred

Alan K. Ngo (CRD #4273116, Jackson, New Jersey)
May 4, 2026 – An AWC was issued in which Ngo was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Ngo consented to the sanction and to the entry of findings that he refused to provide information and documents and to appear for on-the-record testimony requested by FINRA in connection with an investigation into whether he sold securities away from his member firm. The findings stated that FINRA sought from Ngo, among other items, information related to investments he solicited, his communications with customers, and bank and other financial records. (**FINRA Case #2026088818101**)

Kevin Christopher McCarthy (CRD #1702715, Hialeah, Florida)
May 7, 2026 – An AWC was issued in which McCarthy was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, McCarthy consented to the sanction and to the entry of findings that he refused to provide documents and information requested by FINRA. The findings stated that this matter originated from FINRA's review of a Uniform Termination Notice for Securities Industry Registration (Form U5) filing by his member firm. McCarthy was terminated by his firm following an internal review in which it was determined that he had accessed clients' personal bank accounts, and was involved in certain payments made from those accounts, some of which were made to individuals with a familial relationship to McCarthy. (**FINRA Case #2025088420501**)

Michael Christopher Venturino (CRD #5872439, Dix Hills, New York)
May 7, 2026 – A National Adjudicatory Counsel (NAC) decision became final in which Venturino was barred from association with any FINRA member in all capacities for unauthorized trading, and separately for excessive trading and churning. Venturino was also ordered to pay disgorgement in the amount of $144,357, plus interest. The NAC affirmed the findings and modified the sanctions imposed by the Office of Hearing Officers (OHO). The sanctions are based on findings that Venturino executed securities transactions in customer accounts without the prior authorization of those customers. The findings stated that the phone records that Venturino's member firm produced to FINRA of calls to and from Venturino's firm-assigned phone extension, when compared to the records of the trades that he made in the customer accounts, showed significant numbers of transactions that Venturino executed for those accounts that were not preceded by a call between the customer and Venturino. The findings also stated that Venturino excessively traded customer accounts for which he exercised de facto control. Each of the customers relied on Venturino's recommendations to such a level that he controlled the volume and frequency of trading in the customers' accounts. Furthermore, the fact that the customers each routinely accepted Venturino's recommendations of transactions that Venturino almost uniformly solicited, without conducting research of their own or having an independent basis to evaluate his recommendations, further supports the conclusion that Venturino exercised de facto control. In addition, the cost-to-equity ratio for each of the accounts of concern well exceeded 20 percent—in fact, many times more. Venturino's trading resulted in costs so high for each of the relevant accounts as to make almost impossible the possibility of any profits from the transactions that he executed in them. Further, the turnover rates shown by Venturino's trading for each of the accounts also exceeded acceptable norms. Venturino's in-and-out trading, frequent purchases and sales of the same securities, and unauthorized trading in the accounts were found to be further evidence of his excessive trading. The findings also stated that Venturino acted with scienter and therefore churned the customer accounts in willful violation of Exchange Act Section 10(b), Exchange Act Rule 10b-5, and FINRA Rules 2020 and 2010. Venturino did not disclose to the customers that he was charging them markups or markdowns on the securities he purchased or sold on a riskless principal basis for their accounts, and the cost-to-equity ratios for all of the accounts were so high that it was virtually impossible for these customers to profit. Venturino directly or indirectly earned $144,357 from his unauthorized trading, excessive trading, and churning. (FINRA Case #2021070337501)

Mohammed Anayet Karim (CRD #4419277, Davenport, Florida)
May 11, 2026 – An AWC was issued in which Karim was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Karim 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 allegations in a Form U5 filed by his member firm. The findings stated that the Form U5 disclosed that Karim's association with the firm had been terminated due to violations of the firm's Code of Ethics related to his involvement in interactions concerning former clients. (FINRA Case #2025087042501)

Norman Lynn Hill (CRD #1535969, Auburn, New Hampshire)
May 14, 2026 – An AWC was issued in which Hill was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Hill 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 the circumstances giving rise to an amended Form U5

filed by his former member firm disclosing that an internal review had concluded that he had violated company policy. (FINRA Case #2026089178101)

Bryon Edwin Martinsen (CRD #1621649, Kings Park, New York)
May 15, 2026 – An AWC was issued in which Martinsen was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Martinsen consented to the sanction and to the entry of findings that he refused to provide documents and information or to appear for on-the-record testimony requested by FINRA during its review of a Form U5 amendment filed by his former member firm that disclosed that he may have engaged in conduct actionable under an applicable statute, rule, or regulation. (FINRA Case #2025086832701)

Pablo Leonel Gherardi (CRD #4602689, Miami, Florida)
May 18, 2026 – An AWC was issued in which Gherardi was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Gherardi 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 regulatory tip and the allegations contained in a Form U5 filed by his member firm. The findings stated that Gherardi's firm terminated him for facilitating impermissible money-transfer wires and engaging in and deleting off-channel business communications. (FINRA Case #2024084295502)

Marcelo Javier Poliak (CRD #2465622, Key Biscayne, Florida)
May 19, 2026 – An AWC was issued in which Poliak was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Poliak 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 regulatory tip and the allegations contained in a Form U5 filed by his member firm. The findings stated that Poliak's firm terminated him for facilitating impermissible money-transfer wires and engaging in and deleting off-channel business communications. (FINRA Case #2024084295503)

Trevor Uhls (CRD #6872250, Lees Summit, Missouri)
May 19, 2026 – An AWC was issued in which Uhls was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Uhls 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 engaged in fraud through the unauthorized sale of promissory notes. (FINRA Case #2026088975901)

Tasveena Kaur Manjeet Singh (CRD #8003929, Kuala Lumpur, Malaysia)
May 27, 2026 – An AWC was issued in which Manjeet Singh was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Manjeet Singh consented to the sanction and to the entry of findings that she declined to produce information and documents requested by FINRA. The findings stated that this matter originated from a tip filed by FINRA's Credentialing, Registration, Education, and Disclosure (CRED) concerning Manjeet Singh's Series 7 Examination. (FINRA Case #2025088049101)

Shadi Taysir Barakat (CRD #5031281, Cresskill, New Jersey)
May 28, 2026 – An OHO decision became final in which Barakat was barred from association with

any FINRA member in all capacities. The sanction was based on findings that Barakat failed to appear for on-the-record testimony requested by FINRA in connection with its investigation into whether he engaged in churning and excessive trading in his customers' accounts. The findings stated that FINRA was not able to move forward with bringing excessive trading or churning violations related to the customer accounts because it did not have enough information about what was happening in those accounts, and what Barakat's rationale was for those accounts. (**FINRA Case #2018056490315**)

Gabriel Andres Gomez (CRD #7613767, North Bay Village, Florida)
May 28, 2026 – An AWC was issued in which Gomez was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Gomez consented to the sanction and to the entry of findings that he refused to produce information or documents requested by FINRA during an investigation that originated from a tip filed by its CRED Department that he used an unauthorized mobile device during his Series 99 examination. (**FINRA Case #2026089794001**)

Individuals Suspended

Jing Li (CRD #5127356, San Jose, California)
May 15, 2026 – An AWC was issued in which Li was fined $5,000 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Li consented to the sanctions and to the entry of findings that she willfully failed to timely amend her Uniform Application for Securities Industry Registration or Transfer (Form U4) to disclose that she had been charged with two felonies. The findings stated that although Li was aware of the felony charges, she failed to amend her Form U4 within 30 days or disclose the charges to her member firm. Li falsely stated in a firm compliance questionnaire that the information on her Form U4 was accurate, including with respect to any felony charges. Li later falsely stated in a pre-hire questionnaire for another firm that she had never been charged with a felony. The other firm discovered the existence of Li's felony charges through a background check and filed an amended Form U4 for her that disclosed the felony charges. The charges against Li were later dismissed.

The suspension is in effect from June 5, 2026, through September 4, 2026. (**FINRA Case #2025085714301**)

Brian R. Thomas (CRD #4243411, Bloomfield Hills, Michigan)
May 15, 2026 – An AWC was issued in which Thomas was fined $5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Thomas consented to the sanctions and to the entry of findings that he borrowed $50,000 from a firm customer who was not an immediate family member without providing prior written notice to or obtaining approval from his member firm. The findings stated that the customer was a personal friend whose relationship with Thomas predated his status as a customer of the firm. Thomas used the funds to pay for personal expenses. Thomas did not memorialize the loan in writing and did not discuss any repayment terms with the customer. Ultimately, Thomas repaid the full amount of the loan, with interest.

The suspension is in effect from May 15, 2026, through June 14, 2026. (FINRA Case #2025085647701)

Jeffrey Alan Stanley (CRD #4645288, Parker, Colorado)
May 22, 2026 – An Order Accepting Offer of Settlement was issued in which Stanley was suspended from association with any FINRA member in all capacities for four months, suspended from association with any FINRA member in any principal capacity for 12 months, and required to requalify by examination as a General Securities Principal before again acting in that capacity. In light of Stanley's financial status, no monetary sanction has been imposed. Without admitting or denying the allegations, Stanley consented to the sanctions and to the entry of findings that his member firm, while acting through him, failed to establish and maintain a supervisory system reasonably designed to ensure compliance with FINRA rules. The findings stated that from at least September 2023, when Stanley assumed control of his firm's cash management program, to May 2024, he was responsible for establishing, maintaining, and enforcing the firm's supervisory policies and procedures related to its cash management program. The firm's supervisory systems for ensuring compliance with the opening and supervision of cash management accounts and handling of customer funds were unreasonable. In addition, the firm's WSPs were not tailored to the only business line it operated—its cash management program. Instead, the WSPs were general in nature and did not address how the cash management program was operated. The firm drafted money movement procedures, but Stanley never implemented them. Stanley's supervisory failures included approving the opening of the firm's cash management accounts for end users without their adequate authorization and approving or otherwise allowing the movement of customer funds without adequate authorization from customers. In addition, Stanley allowed a non-FINRA member to perform significant brokerage functions, including tracking and accounting for customer funds and keeping the ledger necessary to reconcile customer account balances, without implementing a supervisory system reasonably designed to supervise the non-FINRA member's conduct. Separately, Stanley failed to reasonably investigate red flags of substantial discrepancies between ledgers of customer funds created by the non-member and the ledgers of third-party banks.

The suspension in all capacities is in effect from May 22, 2026, through September 21, 2026. The suspension in any principal capacity is in effect from May 22, 2026, through May 21, 2027. (FINRA Case #2023080111701)

Jennifer Lillian Basey (CRD #4730054, Lehigh Acres, Florida)
May 29, 2026 – An AWC was issued in which Basey was fined $10,000 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Basey consented to the sanctions and to the entry of findings that she paid two customers a total of more than $1,300 to settle complaints without her member firm's knowledge or consent on three different occasions. The findings stated that the firm was initially unaware of these complaints or payments because Basey did not report them. Instead, Basey falsely stated in a firm compliance questionnaire that she had not received any customer complaints in the past 12 months. The findings also stated that Basey failed to report the customer complaints she received to her firm and communicated about securities-related business using a communication channel that was not approved or captured by her firm. Basey exchanged text messages with the complaining customers through her personal mobile phone. These communications discussed securities-related business, such as investment recommendations, customer orders and trades, the customers'

complaints and Basey's undisclosed payments to the customers. By using an unapproved communication channel, Basey caused the firm to fail to capture or maintain these communications. By failing to report the customer complaints she received to the firm, Basey caused the firm to fail to keep a record of those complaints. In addition, Basey falsely attested on firm compliance questionnaires that she did not use text messaging on her personal device for business purposes. Basey also confirmed in the annual employee certifications that she understood business-related texting was prohibited,

The suspension is in effect from June 19, 2026, through September 18, 2026. (**FINRA Case #2023080557601**)

Decisions Issued

The OHO issued the following decision, which has been appealed to or called for review by the NAC as of May 31, 2026. The NAC may increase, decrease, modify or reverse the findings and sanctions imposed in the decision. Initial decisions where the time for appeal has not yet expired will be reported in future *FINRA Disciplinary & Other Actions*.

James Joseph Lukezic (CRD #4284800, North Miami Beach, Florida)
May 15, 2026 – Lukezic appealed an OHO decision to the NAC. Lukezic was barred from association with any FINRA member in all capacities for placing mutual fund exchanges in customer accounts without the customers' authorization or consent. In light of the bar imposed for Lukezic's unauthorized trading, the OHO does not impose further sanctions for providing false or misleading information to FINRA in response to two written Rule 8210 requests and at his OTR. The sanction was based on the findings that all of the accounts owned shares of mutual funds that were distributed by a FINRA member firm and held at its non-member affiliate transfer agent. A member firm that Lukezic acquired became the dealer of record for the accounts. To reverse the exchanges, the firm's affiliated transfer agent had to repurchase the shares of the mutual funds that the customers originally held in their accounts. Because the price of those shares had gone up since the date of the exchanges, reversing the exchanges cost the transfer agent approximately $44,500. The transfer agent bore the amount of that loss and there were no losses incurred by the customers. In addition to confirming that the customers had not authorized the mutual fund exchanges in their accounts, the transfer agent also sought as part of its investigation to determine how the exchanges were made. Because all six of the mutual fund exchanges were processed on the transfer agent's trading platform using Lukezic's login credentials, it tried on multiple occasions to discuss the exchanges with Lukezic and determine whether the exchanges were the result of fraudulent activity. Not once during these conversations did Lukezic suggest that anyone else at his firm could have placed the trades. Nor did he do any investigation into whether the transactions were the result of any security breach at his firm. Instead, Lukezic denied responsibility for the transactions, he tried to shift the blame to the transfer agent, and he threatened it with legal action. The transfer agent ultimately terminated the selling agreement and FINRA started to investigate. While responding to requests for information from FINRA, the transfer agent discovered the recording of a telephone call Lukezic made to the transfer agent the day after the exchanges. In the call, Lukezic asked how his firm would be paid on the mutual fund exchanges. The transfer agent representative informed

Lukezic that the mutual fund exchanges were ineligible for commissions. The findings also stated that Lukezic provided false and misleading written statements to FINRA in response to requests in connection with its investigation into this matter. Lukezic falsely stated that his firm did not have the ability to execute trades on the transfer agent's platform. In later written responses to FINRA, Lukezic falsely stated that he was not involved in placing any trades. The findings also included that Lukezic provided false and misleading on-the-record testimony to FINRA as he denied executing the mutual fund exchanges for the customers.

The sanction is not in effect pending review. (**FINRA Case #2022073425001**)

Sebastian G. Bongiovanni (CRD #4398600, Staten Island, New York)
May 28, 2026 – Bongiovanni appealed an OHO decision to the NAC. Bongiovanni was barred from associating with any FINRA member firm in any capacity for failing to respond to requests for information and documents in connection with a FINRA investigation. The sanction is based on the findings that although Bongiovanni provided partial responses to three prior requests, he never provided the information FINRA requested in December 2023 and January 2024 requests, which specifically sought information that he had not produced in responses to the three prior requests. The hearing panel found that Bongiovanni did not establish a valid defense for his failure to comply.

The sanctions are not in effect pending review. (**FINRA Case #2022077443302**)

Firm 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.)

First Commonwealth Securities Corporation (CRD #20854)
Atlanta, Georgia
(May 11, 2026)

Opes Bespoke Securities LLC (CRD #129841)
New York, New York
(May 11, 2026 – June 3, 2026)

St. Bernard Financial Services, Inc. (CRD #36956)
Russellville, Arkansas
(May 11, 2026 – May 14, 2026)

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.)

William Kershaw (CRD #7861603)
Trinity, North Carolina
(May 15, 2026)
FINRA Case #2025086456101

Robert Leroy Metz (CRD #7282890)
California, Kentucky
(May 15, 2026)
FINRA Case #2025086455301

Keith Wesley Schongar (CRD #6215149)
Hurricane, West Virginia
(May 15, 2026)
FINRA Case #2025086941701

Danielle Rose Sonnenberg (CRD #5884061)
Ithaca, New York
(May 8, 2026)
FINRA Case #2023077022401

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.)

Travis Price Alexander (CRD #5504338)
Long Beach, California
(May 25, 2026)
FINRA Case #2024083809601

Changxi Ji (CRD #7563608)
Walnut, California
(May 4, 2026 – June 30, 2026)
FINRA Case #2025087192701

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
(May 26, 2026)
FINRA Arbitration Case #25-01435

Eileen Law Cure (CRD #2224269)
Nederland, Texas
(May 5, 2026)
FINRA Arbitration Case #23-03292

Randy Cleve Fox (CRD #2726566)
San Francisco, California
(May 6, 2026)
FINRA Arbitration Case #24-01755

James Edward McArthur (CRD #2797856)
Mount Sinai, New York
(May 26, 2026)
FINRA Arbitration Case #25-01435

Brendan Kammerer (CRD #1899233)
Swampscott, Massachusetts
(April 8, 2026)

FINRA Arbitration Case #25-01881

Glenn J Romer (CRD # 4841915)
Toms River, NJ
(April 22, 2026)
FINRA Arbitration Case #25-00645

James Keith Cox (CRD #2365633)
Baton Rouge, LA
(April 27, 2026)
FINRA Arbitration Case #09-03564

Eileen Law Cure (CRD #2224269)
Nederland, TX
(May 5, 2026)
FINRA Arbitration Case #23-03292

Randy Cleve Fox (CRD #2726566)
San Francisco, CA
(May 6, 2026)
FINRA Arbitration Case #24-01755

David Leslie Arlein (CRD #7145)
Boca Raton, FL
(June 8, 2026)
FINRA Arbitration Case #25-00418

Keith David Lundhagen (CRD #4409116)
Long Lake, MN
(June 11, 2026)
FINRA Arbitration Case #25-02673

Ronald George Palmer (CRD #2736169)
White Plains, NY
(June 24, 2026)
FINRA Arbitration Case #25-01105

George John Cairnes (CRD #4068906)
Sugar Land, TX,
(July 8, 2026)
FINRA Arbitration Case #24-00971

PRESS RELEASE

FINRA Fines Pictet Overseas and Blue Ocean ATS for AML and Supervisory Violations Involving Low-Priced Securities

Pictet Overseas Ordered to Pay $610,000; Blue Ocean Ordered to Pay $550,000

FINRA has fined two member firms a total of more than $1.1 million for AML and supervisory violations related to low-priced securities transactions.

Specifically, FINRA fined **Pictet Overseas Inc.** $610,000 for these violations concerning low-priced securities transactions, the majority of which occurred through an omnibus account held by the firm's affiliate, along with other violations.

This action comes on the heels of FINRA's $550,000 fine against **Blue Ocean ATS** for similar violations. Blue Ocean handled 95% of all overnight trading volume since its inception, including a substantial volume of low-priced securities. FINRA ordered Blue Ocean to certify that it remediated the deficiencies with its AML compliance program.

Both firms failed to develop and implement AML compliance programs reasonably designed to detect and cause the reporting of suspicious transactions in low-priced securities. The thin trading volumes, price volatility and limited public information of low-priced securities make them attractive targets for manipulative schemes and fraudulent activity. Effective AML programs are essential for firms that handle low-priced securities transactions to help detect suspicious patterns and prevent illegal activity.

"Firms that engage in high-risk business activity must implement AML programs that are appropriately designed for their specific risk profile," said Bill St. Louis, Executive Vice President and Head of Enforcement at FINRA. "Blue Ocean's and Pictet's monitoring systems were inadequate given their customers' low-priced securities trading. These firms failed to implement the robust surveillance necessary to detect suspicious activity in an area where such risks are well-established."

Pictet executed approximately $300 million of low-priced securities transactions involving more than 150 million shares from February 2022 to March 2023, including nearly $30 million of over-the-counter (OTC) securities. More than 70% of these transactions occurred through an omnibus account held by the firm's foreign financial institution (FFI) affiliate. In June 2021, another regulator alerted Pictet to certain deficiencies in its AML program. Despite this warning and its customers' low-priced securities transactions, Pictet failed to take timely corrective action. The firm did not implement an AML compliance program reasonably designed to detect and cause the reporting of suspicious transactions in low-priced securities from September 2021 to February 2025.

Pictet also failed to commit adequate resources to its AML program and, until February 2023, relied on manually compiled daily reports that could not effectively identify patterns of suspicious activity.

As a result, Pictet did not detect or reasonably investigate red flags of suspicious activity involving low-priced securities. This included instances where customers' trading represented significant portions of daily market volume—in some cases, more than 20% on individual days. Pictet also did not implement a reasonably designed due diligence program for FFI correspondent accounts, including by failing to conduct periodic reviews of FFI account activity. Pictet's supervisory system and procedures also were not reasonably designed to achieve compliance with Section 5 of the Securities Act of 1933 (Securities Act) in connection with low-priced securities.

Additionally, Pictet inaccurately reported transactions to the Trade Reporting and Compliance Engine, issued deficient trade confirmations, and did not reasonably supervise the firm's compliance with those reporting and disclosure obligations.

Despite the rapid growth in Blue Ocean's overnight trading business and the known risks associated with low-priced securities trading, the firm failed to develop and implement—since at least January 2023—an AML compliance program reasonably tailored to the risks of its business and reasonably designed to detect potentially manipulative trading.

Blue Ocean's monitoring consisted primarily of manual reviews by a single employee of a wash sale report and a low-priced securities report, which were insufficient to identify patterns of potential manipulative activity. In practice, the firm conducted no surveillance for spoofing, layering and other manipulative order entry patterns. As a result of its deficient supervision, Blue Ocean failed to detect and investigate red flags of potentially suspicious order schemes.

In settling these matters, Pictet and Blue Ocean consented to the entry of FINRA's findings, without admitting or denying the charges.