

BrokerCheck Report
FINTECH TRADE INC.
CRD# 46350

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About BrokerCheck®



BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:

- o information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
- o information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about the FINRA, visit www.finra.org.

Thank you for using FINRA BrokerCheck.



FINTECH TRADE INC

CRD# 46350

SEC# 8-51390

Main Office Location

The Chestnuts Brewers End,
Takeley, Bishop's Stortford,
United Kingdom, CM22 6QJT

Regulated by FINRA Florida Office

Business Email Address

support@fintechtradefx.com

Report Summary for this Firm

in the detailed report.

Firm Profile

This firm is classified as a corporation.

This firm was formed in Florida on 10/30/1998.

Its fiscal year ends in December.

Firm History

Information relating to the brokerage firm's history, such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 53 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 8 types of businesses.

This firm is affiliated with financial or investment institutions.

This firm has referral or financial arrangements with other brokers or dealers.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? **Yes**

The following types of disclosures have been reported:

Type	Count
Regulatory Event	3



Firm Profile

This firm is classified as a corporation.

This firm was formed in Florida on 10/30/1998.

Its fiscal year ends in December.

Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

FINTECH TRADE INC.

Doing business as FINTECH TRADE INC.

CRD# 46350

SEC# 8-51390

Main Office Location

The Chestnuts Brewers End,
Takeley, Bishop's Stortford,
United Kingdom, CM22 6QJT

Regulated by FINRA Florida Office

Business Email Address

support@fintechtradefx.com
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Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

Direct Owners and Executive Officers

Legal Name & CRD# (if any): FINTECH TRADE, INC.

Is this a domestic or foreign entity or an individual? Domestic Entity

Position SHAREHOLDER

Position Start Date 12/2011

Percentage of Ownership 75% or more

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): BALDWIN, ROBB WALLER
1409477

Is this a domestic or foreign entity or an individual? Individual

Position PRESIDENT/CEO/DIRECTOR/SECRETARY

Position Start Date 10/1998

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): CHRISTENSEN, CHARLES GORDON
4770971

Is this a domestic or foreign entity or an individual? Individual

Position CHIEF FINANCIAL OFFICER/TREASURER

Position Start Date 05/2013

Firm Profile



Direct Owners and Executive Officers (continued)

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): DILBONE, ROBERT POTTER JR
5893751

Is this a domestic or foreign entity or an individual? Individual

Position DIRECTOR

Position Start Date 09/2013

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): HALVOSA, JAMES JEFFREY
2603382

Is this a domestic or foreign entity or an individual? Individual

Position CHIEF COMPLIANCE OFFICER

Position Start Date 05/2016

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No

Legal Name & CRD# (if any): VICTORIA, RICHARD SCOTT

Firm Profile



Direct Owners and Executive Officers (continued)

5371275

Is this a domestic or foreign entity or an individual? Individual

Position CHIEF OPERATING OFFICER

Position Start Date 02/2018

Percentage of Ownership Less than 5%

Does this owner direct the management or policies of the firm? Yes

Is this a public reporting company? No



Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

Indirect Owners

Legal Name & CRD# (if any):	ROBB W. BALDWIN REVOCABLE TRUST
Is this a domestic or foreign entity or an individual?	Domestic Entity
Company through which indirect ownership is established	FINTECH TRADE, INC.
Relationship to Direct Owner	SHAREHOLDER
Relationship Established	08/2017
Percentage of Ownership	75% or more
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	BALDWIN, ROBB WALLER 1409477
Is this a domestic or foreign entity or an individual?	Individual
Company through which indirect ownership is established	ROBB W. BALDWIN REVOCABLE TRUST
Relationship to Direct Owner	TRUSTEE
Relationship Established	08/2017
Percentage of Ownership	Other General Partners
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

No information reported.





Firm Operations

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 1 SRO and 53 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	06/21/1999

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: Yes

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	06/21/1999



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	07/20/1999
Alaska	Approved	06/12/2007
Arizona	Approved	02/25/2000
Arkansas	Approved	09/01/2006
California	Approved	07/07/1999
Colorado	Approved	01/28/2000
Connecticut	Approved	08/21/2000
Delaware	Approved	04/12/2007
District of Columbia	Approved	05/30/1999
Florida	Approved	06/22/1999
Georgia	Approved	09/14/1999
Hawaii	Approved	03/12/2007
Idaho	Approved	06/05/2007
Illinois	Approved	09/03/1999
Indiana	Approved	09/15/2000
Iowa	Approved	05/07/2007
Kansas	Approved	07/12/2007
Kentucky	Approved	02/13/2006
Louisiana	Approved	09/15/1999
Maine	Approved	09/05/2008
Maryland	Approved	06/29/1999
Massachusetts	Approved	03/30/2006
Michigan	Approved	03/08/2006
Minnesota	Approved	08/22/2000
Mississippi	Approved	07/01/1999
Missouri	Approved	05/09/2007
Montana	Approved	03/04/2006
Nebraska	Approved	08/18/2008
Nevada	Approved	02/10/2006
New Hampshire	Approved	03/24/2006
New Jersey	Approved	06/27/2000
New Mexico	Approved	08/13/2007
New York	Approved	06/23/1999

U.S. States & Territories	Status	Date Effective
North Carolina	Approved	06/23/1999
North Dakota	Approved	06/18/2007
Ohio	Approved	06/24/1999
Oklahoma	Approved	01/07/2000
Oregon	Approved	03/29/2006
Pennsylvania	Approved	01/05/2000
Puerto Rico	Approved	04/01/2015
Rhode Island	Approved	08/22/2007
South Carolina	Approved	08/18/1999
South Dakota	Approved	02/09/2006
Tennessee	Approved	06/24/1999
Texas	Approved	07/12/1999
Utah	Approved	02/08/2006
Vermont	Approved	07/12/2007
Virgin Islands	Approved	03/18/2015
Virginia	Approved	07/06/1999
Washington	Approved	05/30/2001
West Virginia	Approved	08/07/2008
Wisconsin	Approved	06/27/2007
Wyoming	Approved	06/11/2007

Firm Operations



Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 8 types of businesses.

Types of Business

- Broker or dealer retailing corporate equity securities over-the-counter
- Broker or dealer selling corporate debt securities
- Mutual fund retailer
- U S. government securities broker
- Municipal securities broker
- Broker or dealer selling variable life insurance or annuities
- Put and call broker or dealer or option writer
- Non-exchange member arranging for transactions in listed securities by exchange member

Firm Operations



Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does refer or introduce customers to other brokers and dealers.

Name: WELLS FARGO CLEARING SERVICES, LLC
CRD #: 19616
Business Address: ONE NORTH JEFFERSON AVENUE
ST. LOUIS, MO 63103
Effective Date: 08/13/2011
Description: TRADE-PMR, INC. HAS A CLEARING ARRANGEMENT WITH WELLS FARGO CLEARING CORPORATION, WHICH OPERATES UNDER THE TRADENAME FIRST CLEARING CORPORATION, TO INTRODUCE CLIENTS ON A FULLY DISCLOSED BASIS.

Firm Operations

Industry Arrangements



This firm does have books or records maintained by a third party.

Name: GLOBAL RELAY COMMUNICATIONS, INC.
Business Address: 220 CAMBIE STREET
2ND FLOOR
VANCOUVER, CANADA V6B 2M9
Effective Date: 01/16/2015
Description: GLOBAL RELAY COMMUNICATIONS PROVIDES EMAIL ARCHIVING SERVICES TO TRADE-PMR, INC.

This firm does have accounts, funds, or securities maintained by a third party.

Name: WELLS FARGO CLEARING SERVICES, LLC
CRD #: 19616
Business Address: ONE NORTH JEFFERSON AVENUE
ST. LOUIS, MO 63103
Effective Date: 08/13/2011
Description: TRADE-PMR, INC. HAS A CLEARING ARRANGEMENT WITH WELLS FARGO CLEARING CORPORATION, TRADE NAME FIRST CLEARING CORPORATION (FCC), TO INTRODUCE CLIENTS ON A FULLY DISCLOSED BASIS. AS SUCH, TRADE-PMR HAS OPERATIONAL ACCOUNTS AT FCC

This firm does have customer accounts, funds, or securities maintained by a third party.

Name: WELLS FARGO CLEARING SERVICES, LLC
CRD #: 19616
Business Address: ONE NORTH JEFFERSON AVENUE
ST. LOUIS, MO 63103
Effective Date: 08/13/2011
Description: TRADE-PMR, INC. HAS A CLEARING ARRANGEMENT WITH WELLS FARGO CLEARING CORPORATION, TRADE NAME FIRST CLEARING CORPORATION (FCC), TO INTRODUCE CLIENTS ON A FULLY DISCLOSED BASIS. AS SUCH, CLIENTS OF TRADE-PMR HAVE ACCOUNTS AT FCC

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

This firm does not have individuals who wholly or partly finance the firm's business.



Firm Operations

Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

This firm is, directly or indirectly:

- in control of
 - controlled by
 - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.

PORTFOLIO MANAGEMENT & RESEARCH, INC. is under common control with the firm.

CRD #:	141667
Business Address:	2511 NW 41ST STREET GAINESVILLE, FL 32606
Effective Date:	07/15/1996
Foreign Entity:	No
Country:	
Securities Activities:	No
Investment Advisory Activities:	Yes
Description:	ROBB BALDWIN (CRD #1409477) IS PRESIDENT/CEO AND OWNER OF PORTFOLIO MANAGEMENT & RESEARCH, INC. AS WELL AS PRESIDENT/CEO AND OWNER OF TRADE-PMR, INC.

This firm is not directly or indirectly, controlled by the following:

- bank holding company
- national bank
- state member bank of the Federal Reserve System
- state non-member bank
- savings bank or association
- credit union
- or foreign bank



Disclosure Events

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	3	0

Disclosure Event Details

What you should know about reported disclosure events:

1. **BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.**
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - o A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - o Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
 - o A disclosure event may have a status of pending, on appeal, or final.
 - § A "pending" event involves allegations that have not been proven or formally adjudicated.
 - § An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - § A "final" event has been concluded and its resolution is not subject to change.
 - o A final event generally has a disposition of adjudicated, settled or otherwise resolved.
 - § An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - § A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - § A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 3

Reporting Source: Regulator
Current Status: Final



Allegations: TRADE-PMR ("RESPONDENT") PROVIDES BROKERAGE AND TECHNOLOGY SERVICES TO PERSONS AND ENTITIES ACTING AS INDEPENDENT INVESTMENT ADVISERS ("ADVISERS"). IN CONNECTION WITH THEIR SERVICES, RESPONDENT OFFERS A DESKTOP ADVISOR WORKSTATION THROUGH WHICH ADVISERS CAN PLACE TRADES. IN THIS REGARD, RESPONDENT IS ACTING AS A DEALER WITH RESPECT TO THE ADVISERS AND THE ADVISERS' CLIENTS. RESPONDENT ESTABLISHED WRITTEN SUPERVISORY PROCEDURES RELATING TO ITS RELATIONSHIPS WITH AND ON-GOING DUE DILIGENCE OF THE ADVISERS THAT INCLUDED COLLECTING INFORMATION FROM ADVISERS DESIGNED, IN PART, TO CONFIRM THE ADVISERS' ONGOING REGISTRATION. DURING JULY 2014 THROUGH JANUARY 2017 (THE "RELEVANT PERIOD") SIXTY (60) OF THE ADVISERS WERE LOCATED IN TEXAS AND HAD BEEN REGISTERED WITH THE SECURITIES COMMISSIONER AS AN INVESTMENT ADVISER. RESPONDENT WAS UNABLE TO DETECT THAT THE REGISTRATIONS OF TWO ADVISERS HAD LAPSED FOR FAILURE TO PAY ANNUAL RENEWAL FEES. ACCORDINGLY, THE TWO ADVISERS CONTINUED PLACING TRADES IN THEIR CLIENTS' ACCOUNTS THROUGH RESPONDENT DURING THE PERIOD FOR WHICH THE TWO ADVISERS WERE NOT REGISTERED AS INVESTMENT ADVISERS FOR A TIME DURING THE RELEVANT PERIOD. RESPONDENT FAILED TO ENFORCE ITS SUPERVISORY PROCEDURES WHEN IT DID NOT OBTAIN DUE DILIGENCE DOCUMENTS REQUIRED UNDER ITS PROCEDURES. THIS FAILURE IS A VIOLATION OF §115.10 OF THE RULES AND REGULATIONS OF THE TEXAS STATE SECURITIES BOARD. IT IS THEREFORE ORDERED THAT FINTECH TRADE INC. IS HEREBY REPRIMANDED. IT IS FURTHER ORDERED THAT TRADE-PMR IS HEREBY ASSESSED AN ADMINISTRATIVE FINE OF TWENTY-FIVE THOUSAND DOLLARS (\$25,000), PAYABLE TO THE STATE OF TEXAS. RESPONDENT AGREED TO CONTRIBUTE \$5,000 TO BE USED FOR INVESTOR EDUCATION EFFORTS IN TEXAS TO THE INVESTOR EDUCATION FUND OF INVESTOR PROTECTION TRUST.

Initiated By: TEXAS
Date Initiated: 11/05/2018
Docket/Case Number: IC18-CAF-03
URL for Regulatory Action:
Principal Product Type: No Product
Other Product Type(s):
Principal Sanction(s)/Relief Sought: Reprimand
Other Sanction(s)/Relief Sought: FINE



Resolution: Consent
Resolution Date: 11/05/2018
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No
Sanctions Ordered: Monetary/Fine \$25,000.00
Other Sanctions Ordered: REPRIMAND
Sanction Details: IT IS THEREFORE ORDERED THAT FINTECH TRADE INC. IS HEREBY REPRIMANDED. IT IS FURTHER ORDERED THAT TRADE-PMR IS HEREBY ASSESSED AN ADMINISTRATIVE FINE OF TWENTY-FIVE THOUSAND DOLLARS (\$25,000), PAYABLE TO THE STATE OF TEXAS. RESPONDENT AGREED TO CONTRIBUTE \$5,000 TO BE USED FOR INVESTOR EDUCATION EFFORTS IN TEXAS TO THE INVESTOR EDUCATION FUND OF INVESTOR PROTECTION TRUST.

Reporting Source: Firm
Current Status: Final
Allegations: FAILURE TO ENFORCE WRITTEN SUPERVISORY PROCEDURES
Initiated By: TEXAS STATE SECURITIES BOARD
Date Initiated: 10/25/2018
Docket/Case Number: IC18-CAF-03
Principal Product Type: No Product
Other Product Type(s):
Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought: CONTRIBUTION TO INVESTOR EDUCATION FUND
Resolution: Order
Resolution Date: 11/05/2018
Sanctions Ordered: Monetary/Fine \$25,000.00
Other Sanctions Ordered: \$5000 CONTRIBUTION TO INVESTOR EDUCATION FUND



Sanction Details: \$25,000 LEVIED AGAINST THE FIRM. THE FIRM WAS ALSO REQUIRED TO CONTRIBUTE \$5,000 TO THE INVESTOR EDUCATION FUND.

Firm Statement THE FIRM DID NOT ENFORCE ITS WRITTEN PROCEDURE, IN CONNECTION WITH TWO TEXAS REGISTRANTS WHOSE REGISTRATION WITH TEXAS HAD LAPSED.

Disclosure 2 of 3

Reporting Source: Regulator

Current Status: Final

Allegations: ON JULY 7, 2016, THE BANKING COMMISSIONER ENTERED A CONSENT ORDER (NO. CO-16-8170-S) WITH RESPECT TO FINTECH TRADE INC., A CONNECTICUT-REGISTERED BROKER-DEALER LOCATED AT 2511 NW 41ST STREET, GAINESVILLE, FLORIDA 32606. THE FIRM FOCUSES ON SERVING THE NEEDS OF REGISTERED INVESTMENT ADVISERS. THE CONSENT ORDER ALLEGED THAT, COMMENCING IN 2010, THROUGH INACTION OR A LACK OF SYSTEM MONITORING, THE FIRM ALLOWED J. CAPITAL ADVISORS WEALTH MANAGEMENT (CRD NO. 151176) AND ITS PRESIDENT AARON JOUSAN JOHNSON (CRD NO. 4402048) TO DEDUCT EXCESSIVE ADVISORY FEES FROM CLIENT ACCOUNTS. J. CAPITAL ADVISORS WEALTH MANAGEMENT'S CONNECTICUT INVESTMENT ADVISER REGISTRATION HAD BEEN REVOKED BY THE COMMISSIONER IN 2013 FOR CONDUCT RELATING TO THE EXCESSIVE ADVISORY FEE DEDUCTIONS (DOCKET NO. RS-13-8063-S). AARON JOUSAN JOHNSON'S INVESTMENT ADVISER AGENT REGISTRATION WAS ALSO REVOKED BY THE DEPARTMENT. ON JULY 14, 2014, THE SECURITIES AND EXCHANGE COMMISSION IMPOSED A PERMANENT BAR ON JOHNSON (DOCKET/CASE NO. 3-15808) IN A COLLATERAL ACTION. THE CONSENT ORDER INVOLVING FINTECH TRADE INC. ALLEGED THAT THE FIRM FAILED TO ESTABLISH, ENFORCE AND MAINTAIN AN EFFECTIVE COMPLIANCE AND SUPERVISORY SYSTEM FOR MONITORING ACCOUNT ACTIVITY THAT WOULD HAVE FLAGGED THE DEDUCTION OF EXCESSIVE CLIENT ADVISORY FEES FROM CLIENT ACCOUNTS, AND THAT THIS CONDUCT VIOLATED SECTION 36B-31-6F OF THE REGULATIONS UNDER THE CONNECTICUT UNIFORM SECURITIES ACT.

Initiated By: CONNECTICUT

Date Initiated: 07/07/2016

Docket/Case Number: CO-16-8170-S

URL for Regulatory Action:

Principal Product Type: No Product



Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: SEE REMEDIAL DESCRIPTION BELOW.

Resolution: Consent

Resolution Date: 07/07/2016

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Sanctions Ordered: Cease and Desist/Injunction

Other Sanctions Ordered: THE CONSENT ORDER DIRECTED THE FIRM TO ENHANCE ITS SUPERVISORY PROCEDURES AND TO CEASE AND DESIST FROM REGULATORY VIOLATIONS. IN ADDITION, THE CONSENT ORDER REQUIRED THAT THE FIRM ESTABLISH A \$75,000 FUND TO BENEFIT AFFECTED CLIENTS OF J. CAPITAL ADVISORS WEALTH MANAGEMENT AND AARON JOUSAN JOHNSON WHO HAD ACCOUNTS AT FINTECH TRADE INC. BETWEEN 2010 AND 2012. FOLLOWING NOTICE, THE AFFECTED CLIENTS COULD FILE A CLAIM FOR PAYMENT FROM THE FUND. MONIES WOULD THEN BE DISBURSED ON A PRO RATA BASIS NO LATER THAN 90 DAYS FOLLOWING THE COMMISSIONER'S ENTRY OF THE CONSENT ORDER.

Sanction Details: SEE RESPONSE TO ITEM 13.B.

Reporting Source: Firm

Current Status: Final

Allegations: SECTION 36B-31-6F OF THE CONNECTICUT SECURITIES CODE, TRADE-PMR INC. FAILED TO ESTABLISH, ENFORCE AND MAINTAIN AN EFFECTIVE COMPLIANCE AND SUPERVISORY SYSTEM.

Initiated By: STATE OF CONNECTICUT, DEPARTMENT OF BANKING SECURITIES AND BUSINESS INVESTMENTS DIVISION

Date Initiated: 07/07/2016

Docket/Case Number: CO-16-8170-S

Principal Product Type: No Product



Other Product Type(s):

Principal Sanction(s)/Relief Sought: Other

Other Sanction(s)/Relief Sought: ESTABLISHMENT OF A FUND OF \$75,000 FOR AFFECTED CLIENTS

Resolution: Consent

Resolution Date: 07/07/2016

Sanctions Ordered: Cease and Desist/Injunction

Other Sanctions Ordered: ESTABLISHMENT OF A FUND OF \$75,000 FOR AFFECTED CLIENTS

Sanction Details: ESTABLISHMENT OF A FUND OF \$75,000 FOR THE BENEFIT OF AFFECTED CLIENTS, JULY 5, 2016

Firm Statement

THE DIVISION ALLEGED THAT UNAFFILIATED INVESTMENT ADVISER, J. CAPITAL ADVISORS WEALTH MANAGEMENT, LLC AND ITS PRINCIPAL AARON JOHNSON ("J. CAPITAL"), DEDUCTED EXCESS FEES FROM THEIR CLIENTS' ACCOUNTS HELD THROUGH TRADE-PMR. UPON ACCOUNT OPENING, EACH ACCOUNT HOLDER AFFIRMED TO TRADE-PMR THAT THEY HAD GRANTED J. CAPITAL AUTHORIZATION TO DEDUCT ADVISORY FEES FROM THEIR TRADE-PMR ACCOUNTS PURSUANT TO J. CAPITAL'S INSTRUCTIONS AND TRADE-PMR NOTIFIED CLIENTS OF EACH ADVISORY FEE J. CAPITAL DEDUCTED FROM THEIR ACCOUNTS. IN 2013, THE DIVISION BARRED J. CAPITAL AND JOHNSON FROM REGISTRATION FOR DEDUCTING EXCESS INVESTMENT ADVISORY FEES FROM THEIR CLIENT'S ACCOUNTS. SUBSEQUENTLY, THE DIVISION ALLEGED THAT TRADE-PMR, INC.'S SUPERVISORY PROCEDURES WERE INADEQUATE WITH RESPECT TO ITS MONITORING OF THE J. CAPITAL-ADVISED ACCOUNTS. WITHOUT ADMITTING OR DENYING THE ALLEGATIONS AND SOLELY FOR THE PURPOSE OF RESOLVING THIS MATTER, TRADE-PMR AGREED TO A CONSENT ORDER WITH FINDINGS THAT IT VIOLATED SECTION 36B-31-6F OF THE CONNECTICUT SECURITIES REGULATIONS AND THE ESTABLISHMENT OF A FUND FOR AFFECTED CUSTOMERS.

Disclosure 3 of 3

Reporting Source: Regulator

Current Status: Final

Allegations: N/A

Initiated By: FLORIDA OFFICE OF FINANCIAL REGULATION

Date Initiated: 12/07/2015



Docket/Case Number: 0767-S-03/14

URL for Regulatory Action:

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 12/07/2015

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Sanctions Ordered: Monetary/Fine \$15,000.00

Other Sanctions Ordered: N/A

Sanction Details: 12/7/2015 - \$15,000 ADMINISTRATIVE FINE PAID IN FULL.

Regulator Statement ON DECEMBER 7, 2015, THE OFFICE OF FINANCIAL REGULATION ENTERED A FINAL ORDER ADOPTING THE STIPULATION AND CONSENT AGREEMENT IN THE MATTER OF TRADE-PMR, INC. TRADE-PMR, INC. NEITHER ADMITTED NOR DENIED THE FINDINGS BUT CONSENTED TO THE ENTRY FINDINGS BY THE OFFICE. THE OFFICE FOUND THAT TRADE-PMR, INC. ENGAGED IN PROHIBITED BUSINESS PRACTICES BY FAILING TO REPORT A CUSTOMER COMPLAINT TO FINRA WITHIN 10 BUSINESS DAYS, KEEP AND PRESERVE A SEPARATE FILE OF ALL WRITTEN CUSTOMER COMPLAINTS, AND MAINTAIN AND ENFORCE WRITTEN SUPERVISORY PROCEDURES. TRADE-PMR, INC. AGREED TO PAY AN ADMINISTRATIVE FINE OF \$15,000.

Reporting Source: Firm

Current Status: Final

Allegations: ALLEGED VIOLATIONS OF RULE 69W-600.013(1)(H)1, FLORIDA ADMINISTRATIVE CODE AND NASD RULES 3010(B)(1) AND 3110(D).

Initiated By: STATE OF FLORIDA OFFICE OF FINANCIAL REGULATION

Date Initiated: 11/17/2015



Docket/Case Number: NO. 0767-S-03/14

Principal Product Type: No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Stipulation and Consent

Resolution Date: 12/07/2015

Sanctions Ordered: Monetary/Fine \$15,000.00

Other Sanctions Ordered:

Sanction Details: \$15,000 FINE LEVIED AND PAID ON 11/17/2015.

Firm Statement ON DECEMBER 7, 2015, THE FIRM ENTERED INTO A STIPULATION AND CONSENT AGREEMENT WITH THE STATE OF FLORIDA OFFICE OF FINANCIAL REGULATION IN WHICH, WITHOUT ADMITTING OR DENYING THE FINDINGS, IT AGREED TO THE ENTRY OF FINDINGS THAT THE FIRM VIOLATED RULE 69W-600.013(1)(H)1 FAC AND NASD RULE 3010(B)(1) BY FAILING TO MAINTAIN AND ENFORCE ITS WRITTEN SUPERVISORY PROCEDURES AND 69A-600.013(1)(H)1 FAC AND NASD RULE 3110(D) BY FAILING TO KEEP AND PRESERVE A SEPARATE FILE OF WRITTEN CUSTOMER COMPLAINTS. THE FIRM AGREED TO A FINE OF \$15,000.

End of Report



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