## Office of Financial Regulation Disciplinary Guidelines for Chapters 517, Florida Statutes (F.S.), and 69W, Florida Administrative Code (F.A.C.)

Incorporated by Reference in Rule 69W-1000.001, F.A.C. Effective date: 10-24

Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
1	Securities Registration	517.07	Registration of Securities	Notice of Non-Compliance, Fine B to Fine C, Restriction, Suspension A to Suspension C	Fine B to Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine B to Fine D, Restriction, Suspension C, Revocation, Bar
2	Dealer/Adviser/Age nt Registration	517.12	Registration of Dealers, Associated Persons, and Branch Offices	Notice of Non-Compliance, Fine A to Fine C, Restriction, Suspension A to Suspension C	Fine A to Fine C, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine B to Fine D, Restriction, Suspension C, Revocation, Bar
3	Dealer/Adviser Branch Office Notification	517.1202	Branch Office Notice Filing	Fine C to Fine D and Summary Suspension of Branch, Revocation	\$10,000 Fine and Summary Suspension of Branch, Revocation	\$10,000 Fine and Summary Suspension of Branch, Revocation
4	Dealer/Adviser/Age nt/ Branch Office Books and Records	517.121(3)	Books and Records Requirements; Examinations	Summary Suspension	Summary Suspension	Summary Suspension
5	Dealer/Adviser/Age nt Registration	517.161	Revocation, Denial, or Suspension of Registration of Dealer, Investment Adviser, Associated Person, or Branch Office	Denial, Restriction, Suspension, Summary Suspension, Revocation, Bar	Denial, Restriction, Suspension, Summary Suspension, Revocation, Bar	Denial, Restriction, Suspension, Summary Suspension, Revocation, Bar
6	Commodities	517.275	Commodities; Prohibited Practices	Restriction, Fine A to Fine D, Suspension A to Suspension C, Revocation, Bar	Restriction, Fine A to Fine D, Suspension A to Suspension C, Revocation, Bar	Restriction, Fine A to Fine D, Suspension A to Suspension C, Revocation, Bar
7	Anti-Fraud	517.301	Fraudulent Transactions; Falsification or Concealment of Facts	Fine D, Revocation, Bar	Fine D, Revocation, Bar	Fine D, Revocation, Bar
8	Dealer Registration	69W-600.001	Application for Registration as a Dealer (FINRA)	Notice of Non- Compliance, Fine A to Fine B, Restriction, Suspension B to C	Fine B to Fine D, Restriction, Suspension B to C, Revocation	Fine C to Fine D, Restriction, Suspension B to C, Revocation

Natural Person - Fine A = Up to \$5,000; Fine B = \$5,001 to \$10,000; Fine C = \$10,001 to \$15,000; Fine D = \$15,001 to \$20,000 / Business Entity - Fine A = Up to \$6,250; Fine B = \$6,251 to \$12,000; Fine C = \$12,001 to \$18,750; Fine D = \$18,751 to \$25,000

Suspension A = Up to 5 days; Suspension B = 6 to 30 days; Suspension C = over 30 days

Statutory authority: Fine – Section 517.191(9), Florida Statutes; Restriction – Section 517.161, Florida Statutes; Suspension, Revocation – Section 517.111 and 517.161, Florida Statutes; Summary Suspension – Section 517.121 and 517.1202, Florida Statutes; Bar – Section 517.191(10), Florida Statutes

Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
9	Dealer Registration	69W-600.0012	Application for Registration as a Dealer (non- FINRA)	Notice of Non- Compliance, Fine A to Fine B, Restriction, Suspension B to C	Fine B to Fine D, Restriction, Suspension B to C, Revocation	Fine C to Fine D, Restriction, Suspension B to C, Revocation
10	Dealer Registration	69W-600.0015	Canadian Dealer Notice-Filing	Notice of Non- Compliance, Fine A to B, Suspension A to Suspension C, Revocation	Fine B, Suspension A to Suspension C, Revocation	Fine B, Suspension B to Suspension C, Revocation
11	Adviser Registration	69W-600.0016	Application for Registration as an Investment Adviser (State Registered)	Notice of Non- Compliance, Fine A to Fine B, Restriction, Suspension B to C	Fine B to Fine D, Restriction, Suspension B to C, Revocation	Fine C to Fine D, Restriction, Suspension B to C, Revocation
12	Adviser Registration	69W-600.0017	Notice-Filing for Federal Covered Advisers	Notice of Non- Compliance, Fine A to Fine B, Restriction, Suspension B to C	Fine B to Fine D, Restriction, Suspension B to C, Revocation	Fine C to Fine D, Restriction, Suspension B to C, Revocation
13	Dealer Agent Registration	69W-600.002	Application for Registration as an Associated Person (FINRA Dealer)	Notice of Non- Compliance, Fine A to Fine B, Restriction, Suspension B to C	Fine B to Fine D, Restriction, Suspension B to C, Revocation	Fine C to Fine D, Restriction, Suspension B to C, Revocation
14	Dealer/Agent Registration	69W- 600.002(11)	Continuing Education Requirements	Fine A to Fine B, Suspension A to Suspension C	Fine B to Fine C, Suspension B to Suspension C	Fine C to Fine D, Suspension B to Suspension C
15	Dealer Agent Registration	69W-600.0022	Application for Registration as an Associated Person (Non- FINRA Dealer)	Notice of Non- Compliance, Fine A to Fine B, Restriction, Suspension B to C	Fine B to Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine C to Fine D, Restriction, Suspension B to Suspension C, Revocation
16	Adviser Agent Registration	69W-600.0024	Application for Registration as an Associated Person (Investment Adviser)	Notice of Non- Compliance, Fine A to Fine B, Restriction, Suspension B to Suspension C	Fine B to Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine C to Fine D, Restriction, Suspension B to Suspension C, Revocation
17	Dealer Branch Office Registration	69W-600.0031	Notice-Filing of Branch Office (FINRA Dealer)	Fine C to Fine D and Summary Suspension of Branch, Revocation	\$10,000 Fine and Summary Suspension of Branch, Revocation	\$10,000 Fine and Summary Suspension of Branch, Revocation
18	Dealer Branch Office Registration	69W-600.0032	Notice-Filing of Branch Office (Non- FINRA Dealer)	Fine C to Fine D and Summary Suspension of	\$10,000 Fine and Summary Suspension of Branch,	\$10,000 Fine and Summary Suspension of Branch, Revocation

Suspension A = Up to 5 days; Suspension B = 6 to 30 days; Suspension C = over 30 days

Statutory authority: Fine – Section 517.191(9), Florida Statutes; Restriction – Section 517.161, Florida Statutes; Suspension, Revocation – Section 517.111 and 517.161, Florida Statutes; Summary Suspension – Section 517.121 and 517.1202, Florida Statutes; Bar – Section 517.191(10), Florida Statutes

Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
				Branch, Revocation	Revocation	
19	Adviser Branch Office Registration	69W-600.0034	Notice-Filing of Branch Office (Investment Adviser)	Fine C to Fine D and Summary Suspension of Branch, Revocation	\$10,000 Fine and Summary Suspension of Branch, Revocation	\$10,000 Fine and Summary Suspension of Branch, Revocation
20	Dealer Rules of Conduct	69W-600.012(1)	Confirmation of Transactions	Notice of Non- Compliance, Fine A to Fine B	Fine A to Fine B, Restriction, Suspension A to Suspension B	Fine A to Fine C, Restriction, Suspension A to Suspension C, Revocation
21	Dealer Rules of Conduct	69W-600.012(2)	Customer Contracts - Prohibitions	Notice of Non- Compliance, Fine A to Fine C	Fine A to Fine C, Restriction, Suspension A to Suspension B	Fine A to Fine C, Restriction, Suspension A to Suspension C, Revocation
22	Dealer/Adviser Rules of Conduct	69W-600.012(4)	Copies of Contracts to be Provided to Customers	Notice of Non- Compliance, Fine A to Fine C, Suspension A to Suspension B	Fine B to Fine C, Suspension A to Suspension C	Fine B to Fine C, Suspension A to Suspension C, Revocation
23	Dealer/Agent Rules of Conduct	69W-600.012(5)	Anti-Fraud	Fine D, Revocation, Bar	Fine D, Revocation, Bar	Fine D, Revocation, Bar
24	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(a)	Extension of Credit	Notice of Non- Compliance, Fine B to Fine C	Fine B to Fine D, Suspension A to Suspension B, Revocation	Fine C to Fine D, Suspension B to Suspension C, Revocation, Bar
25	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(b)	Margin Agreement	Notice of Non- Compliance, Fine B to Fine C	Fine B to Fine D, Suspension A to Suspension B, Restriction	Fine C to Fine D, Suspension B to Suspension C, Revocation, Bar
26	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(c)	Segregation of Securities	Notice of Non- Compliance, Fine B to Fine C	Fine B to Fine D, Suspension A to Suspension B	Fine C to Fine D, Suspension B to Suspension C, Revocation
27	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(d)	Hypothecating of Securities	Notice of Non- Compliance, Fine B to Fine D	Fine C to Fine D, Suspension B to Suspension C, Restriction	Fine D, Suspension C, Revocation
28	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(e)	Failing to Execute an Order	Notice of Non- Compliance, Fine B to Fine D, Restriction	Fine B to Fine D, Suspension A to Suspension C,	Fine D, Suspension A to Suspension C, Revocation, Bar

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Statutory authority: Fine – Section 517.191(9), Florida Statutes; Restriction – Section 517.161, Florida Statutes; Suspension, Revocation – Section 517.111 and 517.161, Florida Statutes; Summary Suspension – Section 517.121 and 517.1202, Florida Statutes; Bar – Section 517.191(10), Florida Statutes

Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
29	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(f)	Unregistered Securities	Notice of Non-Compliance, Fine B to Fine C, Restriction, Suspension A to Suspension C	Fine B to Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine B to Fine D, Restriction, Suspension C, Revocation, Bar
30	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(g)	Representation of Qualifications	Notice of Non-Compliance, Fine C to Fine D, Suspension A to Suspension B, Restriction	Fine C to Fine D, Suspension B to Suspension C, Restriction, Revocation	Fine B to Fine D, Restriction, Suspension C, Revocation, Bar
31	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2010	Standards of Commercial Honor and Principles of Trade	Notice of Non- Compliance, Fine B to Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine D, Restriction, Suspension C, Revocation, Bar	Fine D, Revocation, Bar
32	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2020	Use of Manipulative, Deceptive or Other Fraudulent Devices	Fine D, Suspension C, Revocation, Bar	Fine D, Revocation, Bar	Fine D, Revocation, Bar
33	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2040	Payments to Unregistered Persons	Fine D, Restriction, Suspension A to Suspension B	Fine D, Restriction, Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar
34	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 1020	Books and Records	Notice of Non- Compliance, Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar	Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar	Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar
35	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2081	Prohibited Conditions Relating to Expungement of Customer Dispute	Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine D, Restriction, Suspension C, Revocation	Fine D, Revocation, Bar
36	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2090	Know Your Customer	Fine C to Fine D, Restriction, Suspension A to Suspension C,	Fine D, Restriction, Suspension C, Revocation	Fine D, Revocation, Bar

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Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
37	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule	Recommendations to Customers (Suitability)	Fine C to Fine D, Restriction, Suspension A to Suspension C,	Fine D, Restriction, Suspension C, Revocation	Fine D, Revocation, Bar
38	Dealer/Agent Prohibited Business	2111 69W- 600.013(1)(h)1	Recommendations to Customers in	Revocation  Fine C to Fine D, Restriction,	Fine D, Restriction,	Fine D, Revocation, Bar
	Practices  Practices	and (2)(h) FINRA Rule 2114(a)	OTC Equity Securities  Recommendations	Suspension A to Suspension C, Revocation	Suspension C, Revocation	Fine D, Suspension C
39	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2114(c)	to Customers in OTC Equity Securities	Compliance, Fine C to Fine D, Restriction	D, Restriction, Suspension A	Fine D, Suspension C
40	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2114(d)	Recommendations to Customers in OTC Equity Securities	Fine B to Fine C, Restriction, Suspension A	Fine C to Fine D, Restriction, Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar
41	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2121	Fair Prices and Commissions	Fine B to Fine D, Restriction, Suspension A to C, Revocation, Bar	Fine D, Restriction, Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar
42	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2122	Charges for Services Performed	Notice of Non- Compliance, Fine B to Fine C, Restriction, Suspension A	Fine B to Fine D, Restriction, Suspension B	Fine C to Fine D, Suspension C, Revocation, Bar
43	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2124	Net Transactions with Customers	Fine C to Fine D, Restriction	Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar
44	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2130	Approval Procedures for Day- Trading Accounts	Notice of Non-Compliance, Fine B to Fine C, Restriction	Fine C to Fine D, Suspension A to B	Fine C to Fine D, Suspension B to C
45	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2140	Interfering With the Transfer of Customer Accounts in the Context of	Notice of Non- Compliance, Fine B to Fine C	Fine C to Fine D	Fine D, Suspension A to Suspension B

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Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
			Employment Disputes			
46	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2150(a)	Improper Use of Customers' Securities or Funds; Prohibition Against Guarantees and Sharing in Accounts	Fine D, Restriction, Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar
47	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2150(b)	Improper Use of Customers' Securities or Funds; Prohibition Against Guarantees and Sharing in Accounts	Fine C to Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine D, Restriction, Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar
48	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2150(c)	Improper Use of Customers' Securities or Funds; Prohibition Against Guarantees and Sharing in Accounts	Fine C, Restriction, Suspension B to Suspension C	Fine D, Restriction, Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar
49	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2210(b), (c)	Communications with the Public	Notice of Non- Compliance, Fine A to Fine C, Restriction	Fine A to Fine C, Restriction	Fine C to Fine D, Suspension A to Suspension B
50	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2210(d)	Communications with the Public	Notice of Non-Compliance, Fine B to Fine C, Suspension A to Suspension B, Restriction	Fine B to Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar
51	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2212	Use of Investment Companies Rankings in Retail Communications	Notice of Non-Compliance, Fine B to Fine C, Suspension A to Suspension B, Restriction	Fine B to Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar
52	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2220(b), (c)	Options Communication	Fine B to Fine C, Restriction	Fine C to Fine D, Restriction, Suspension B to Suspension C	Fine D, Suspension C

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53	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2220(d)	Options Communication	Notice of Non- Compliance, Fine B to Fine C, Suspension A to Suspension B, Restriction	Fine B to Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar
54	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1a nd (2)(h) FINRA Rule 2231	Customer Account Statements	Notice of Non- Compliance, Fine A to Fine B	Fine A to Fine C, Suspension A	Fine C to Fine D, Suspension B to Suspension C
55	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2241	Research Analysts and Research Reports	Notice of Non-Compliance, Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine D, Restriction, Suspension C, Revocation, Bar
56	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2242	Debt Research Analysts and Debt Research Reports	Notice of Non-Compliance, Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine D, Restriction, Suspension C, Revocation, Bar
57	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2251	Forwarding of Proxy and Other Materials	Notice of Non- Compliance, Fine A to Fine B	Fine B to Fine C	Fine C to Fine D
58	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2262	Disclosure of Control Relationship with Issuer	Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar
59	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2264	Margin Disclosure Statement	Fine B to Fine C, Restriction	Fine D, Restriction, Suspension A to Suspension B	Fine D, Suspension C, Revocation, Bar
60	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2265	Extended Hours Trading Risk Disclosure	Notice of Non- Compliance, Fine B to Fine C	Fine B to Fine D, Restriction	Fine C to Fine D, Suspension B to Suspension C
61	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2266	SIPC Information	Notice of Non- Compliance, Fine A	Fine A	Fine B

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62	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2267	Investor Education and Protection	Notice of Non- Compliance, Fine A	Fine A	Fine B
63	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2269	Disclosure of Participation or Interest in Primary or Secondary Distribution	Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar
64	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2272	Sales and Offers of Sales of Securities on Military Installations	Notice of Non-Compliance, Fine B to Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine D, Restriction, Suspension C, Revocation	Fine D, Revocation, Bar
65	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2273	Educational Communication Related to Recruitment Practices and Account Transfers	Notice of Non- Compliance, Fine A to Fine C, Restriction	Fine A to Fine C, Restriction	Fine C to Fine D, Suspension A to Suspension B
66	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2310(b)	Direct Participation Programs	Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine D, Restriction, Suspension C, Revocation	Fine D, Revocation, Bar
67	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2310(c)	Direct Participation Programs	Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine D, Restriction, Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar
68	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2320	Variable Contracts of an Insurance Company	Notice of Non- Compliance, Fine C to Fine D, Restriction, Suspension A to Suspension C	Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine D, Suspension C, Revocation
69	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2330	Members' Responsibilities Regarding Deferred Variable Annuities	Notice of Non- Compliance, Fine C to Fine D, Restriction, Suspension A to Suspension C	Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine D, Suspension C, Revocation

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70	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2341	Investment Company Securities	Fine C to Fine D, Restriction, Suspension A	Fine D, Restriction, Suspension A to Suspension C	Fine D, Suspension C, Revocation, Bar
71	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2342	"Breakpoint" Sales	Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine D, Restriction, Suspension C, Revocation	Fine D, Revocation, Bar
72	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2352	Account Approval - Trading in Index Warrants, Currency Index Warrants and Currency Warrants	Notice of Non- Compliance, Fine B to Fine C	Fine B to Fine D, Restriction, Suspension A	Fine C to Fine D, Suspension A to Suspension C
73	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2353	Suitability - Trading in Index Warrants, Currency Index Warrants and Currency Warrants	Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine D, Restriction, Suspension C, Revocation	Fine D, Revocation, Bar
74	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2354	Discretionary Accounts - Trading in Index Warrants, Currency Index Warrants and Currency Warrants	Notice of Non- Compliance, Fine B to Fine C, Restriction	Fine B to D, Restriction, Suspension B	Fine D, Suspension C, Revocation
75	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2355	Supervision of Accounts - Trading in Index Warrants, Currency Index Warrants and Currency Warrants	Notice of Non- Compliance, Fine B to Fine D, Restriction	Fine B to Fine D, Restriction	Fine C to Fine D, Suspension A, Restriction
76	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2357	Communications with the Public and Customers Concerning Index Warrants, Currency Index Warrants and Currency Warrants	Notice of Non- Compliance, Fine B to Fine C, Restriction	Fine C to Fine D, Restriction, Suspension B to Suspension C	Fine D, Suspension C
77	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2358	Maintenance of Records - Trading in Index Warrants, Currency Index Warrants and Currency Warrants	Notice of Non- Compliance, Fine A to Fine B	Fine A to Fine C, Restriction	Fine C to Fine D, Suspension A to Suspension C

Suspension A = Up to 5 days; Suspension B = 6 to 30 days; Suspension C = over 30 days

Statutory authority: Fine – Section 517.191(9), Florida Statutes; Restriction – Section 517.161, Florida Statutes; Suspension, Revocation – Section 517.111 and 517.161, Florida Statutes; Summary Suspension – Section 517.121 and 517.1202, Florida Statutes; Bar – Section 517.191(10), Florida Statutes

Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
78	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2359	Position and Exercise Limits; Liquidations - Trading in Index Warrants, Currency Index Warrants and Currency Warrants	Fine C to Fine D, Restriction	Fine D, Restriction, Suspension B to Suspension C	Fine D, Suspension C, Revocation, Bar
79	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2360	Options	Notice of Non- Compliance, Fine B to Fine D, Restriction, Suspension A to Suspension B	Fine B to D, Restriction, Suspension B	Fine D, Suspension C, Revocation
80	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 2370(b)	Security Futures	Notice of Non- Compliance, Fine B to Fine C, Restriction	Fine B to D, Restriction, Suspension A to Suspension B	Fine D, Suspension B to Suspension C, Revocation
81	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 3110	Supervision	Notice of Non- Compliance Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine D, Restriction, Suspension A to Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar
82	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 3120	Supervisory Control System	Notice of Non- Compliance, Fine D, Restriction	Fine D, Restriction, Suspension A to Suspension B	Fine D, Suspension C, Restriction, Revocation, Bar
83	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1a nd (2)(h), FINRA Rule 3130	Annual Certification of Compliance and Supervisory Processes	Notice of Non-Compliance, Fine C to Fine D, Restriction	Fine C to Fine D, Restriction, Suspension A to Suspension B	Fine D, Suspension B to Suspension C, Restriction
84	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 3160(a)	Broker/Dealer Conduct on the Premises of Financial Institutions	Notice of Non- Compliance, Fine B to Fine C, Restriction	Fine B to Fine D, Restriction, Suspension A	Fine D, Suspension C, Revocation, Bar
85	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 3170	Tape Recording of Registered Persons by Certain Firms	Notice of Non-Compliance, Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine D, Restriction, Suspension A to Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar

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Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
86	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 3210	Accounts at Other Broker- Dealers and Financial Institutions	Notice of Non-Compliance, Fine A to Fine C, Restriction, Suspension A to Suspension C	Fine C to Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine C to Fine D, Suspension B to Suspension C, Revocation, Bar
87	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 3230(a), (b), (e)- (l)	Telemarketing	Notice of Non- Compliance, Fine A to Fine B, Restriction	Fine B to Fine D, Restriction	Fine D
88	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 3230(d)	Telemarketing	Notice of Non- Compliance, Fine C, Restriction	Fine D, Restriction	Fine D, Suspension A
89	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 3240	Borrowing From or Lending to Customers	Notice of Non- Compliance, Fine B to Fine C, Restriction, Suspension A to Suspension C	Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar
90	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 3260(a)	Discretionary Accounts	Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine D, Restriction, Suspension C, Revocation	Fine D, Revocation, Bar
91	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 3260(b), (c)	Discretionary Accounts	Notice of Non- Compliance, Fine A to Fine C, Restriction	Fine B to Fine C, Restriction, Suspension A to Suspension B	Fine C to Fine D, Suspension B to Suspension C, Revocation, Bar
92	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 3270	Outside Business Activity	Notice of Non- Compliance, Fine A to Fine C, Restriction, Suspension A to Suspension C	Fine C to Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine C to Fine D, Suspension B to Suspension C, Revocation, Bar
93	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 3280	Private Securities Transactions	Fine B to Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar
94	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 3310	Anti-Money Laundering Compliance Program	Notice of Non-Compliance, Fine C to Fine D, Restriction, Suspension A to Suspension C	Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar

Suspension A = Up to 5 days; Suspension B = 6 to 30 days; Suspension C = over 30 days

Statutory authority: Fine – Section 517.191(9), Florida Statutes; Restriction – Section 517.161, Florida Statutes; Suspension, Revocation – Section 517.111 and 517.161, Florida Statutes; Summary Suspension – Section 517.121 and 517.1202, Florida Statutes; Bar – Section 517.191(10), Florida Statutes

Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
95	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 4210	Margin Requirements	Notice of Non- Compliance, Fine B to Fine C	Fine B to Fine D, Suspension A to Suspension B, Revocation	Fine C to Fine D, Suspension B to Suspension C, Revocation, Bar
96	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 4311	Carrying Agreements	Fine C to Fine D	Fine D	Fine D, Suspension A to Suspension B
97	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h), FINRA Rule 4360	Fidelity Bonds	Fine C to Fine D, Restriction	Fine D, Restriction, Suspension A to Suspension C	Fine D, Suspension C, Revocation, Bar
98	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 4530	Reporting Requirements	Notice of Non- Compliance, Fine A to Fine D, Restriction, Suspension B to C	Fine B to D, Restriction, Suspension B to Suspension C, Revocation	Fine C to D, Restriction, Suspension B to C, Revocation
99	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 5121	Public Offerings of Securities With Conflicts of Interest	Notice of Non-Compliance, Fine C to Fine D, Restriction, Suspension A to Suspension C,	Fine C to Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine D, Restriction, Suspension C, Revocation, Bar
100	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 5141	Sale of Securities in a Fixed Price Offering	Fine C to Fine D, Restriction, Suspension A	Fine D, Restriction, Suspension A to B, Revocation, Bar	Fine D, Suspension C, Revocation, Bar
101	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 5160	Disclosure of Price and Concessions in Selling Agreements	Fine C to Fine D, Restriction, Suspension A	Fine D, Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar
102	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 5230	Payments Involving Publications that Influence the Market Price of a Security	Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar	Fine D, Revocation, Bar
103	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 5240	Anti-Intimidation /Coordination	Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar	Fine D, Revocation, Bar

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Statutory authority: Fine – Section 517.191(9), Florida Statutes; Restriction – Section 517.161, Florida Statutes; Suspension, Revocation – Section 517.111 and 517.161, Florida Statutes; Summary Suspension – Section 517.121 and 517.1202, Florida Statutes; Bar – Section 517.191(10), Florida Statutes

Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
104	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 5250	Payments for Market Making	Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar	Fine D, Revocation, Bar
105	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 5280	Trading Ahead of Research Reports	Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar	Fine D, Revocation, Bar
106	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 5310	Best Execution and Interpositioning	Notice of Non-Compliance, Fine A to Fine B, Restriction, Suspension A to B, Revocation	Fine A to Fine C, Restriction, Suspension A to B, Revocation	Fine B to Fine D, Restriction, Suspension B to C, Revocation, Bar
107	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h), FINRA Rule 5320	Trading Ahead of Customer Market Orders	Fine B to Fine D, Restriction, Suspension A to Suspension C, Revocation, Bar	Fine D, Suspension A to Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar
108	Dealer/Agent Prohibited Business Practices	69W- 600.013(1)(h)1 and (2)(h) FINRA Rule 5330	Adjustment of Open Orders	Fine B to Fine C	Fine C to Fine D, Suspension A	Fine D, Suspension C
109	Dealer Prohibited Business Practices	69W- 600.013(1)(h)2, New York Stock Exchange Rule 435	Circulation of Rumors	Fine C to Fine D, Suspension B to Suspension C, Revocation	Fine D, Restriction, Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar
110	Dealer Prohibited Business Practices	69W- 600.013(1)(h)3, Section 5 of the Securities Act of 1933	Prohibitions Relating to Interstate Commerce and the Mails	Notice of Non- Compliance, Fine B to Fine C, Restriction, Suspension A to Suspension C	Fine B to Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine B to Fine D, Restriction, Suspension C, Revocation, Bar
111	Dealer Prohibited Business Practices	69W- 600.013(1)(h)3, Section 6 of the Securities Act of 1933	Registration of Securities	Notice of Non-Compliance, Fine B to Fine C, Restriction, Suspension A to Suspension C	Fine B to Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine B to Fine D, Restriction, Suspension C, Revocation, Bar

Suspension A = Up to 5 days; Suspension B = 6 to 30 days; Suspension C = over 30 days

Statutory authority: Fine – Section 517.191(9), Florida Statutes; Restriction – Section 517.161, Florida Statutes; Suspension, Revocation – Section 517.111 and 517.161, Florida Statutes; Summary Suspension – Section 517.121 and 517.1202, Florida Statutes; Bar – Section 517.191(10), Florida Statutes

Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
112	Dealer Prohibited Business Practices	69W- 600.013(1)(h)3, 17 CFR 230.134, 17 CFR 230.134a	Communications Deemed Not to be a Prospectus	Notice of Non- Compliance, Fine A to Fine C, Restriction, Suspension A to Suspension C	Fine A to Fine C, Restriction, Suspension B to Suspension C, Bar	Fine B to Fine D, Restriction, Suspension C, Revocation, Bar
113	Dealer Prohibited Business Practices	69W- 600.013(1)(h)3, 17 CFR 230.144, 17 CFR 230.144A	Persons Not Engaged in Distributions or an Underwriter	Notice of Non- Compliance, Fine A to Fine C, Restriction, Suspension A to Suspension C	Fine A to Fine C, Restriction, Suspension B to Suspension C, Bar	Fine B to Fine D, Restriction, Suspension C, Revocation, Bar
114	Dealer Prohibited Business Practices	69W- 600.013(1)(h)3, 17 CFR 230.156	Investment Company Sales Literature	Notice of Non- Compliance, Fine A to Fine C, Restriction	Fine A to Fine C, Restriction	Fine C to Fine D, Suspension A to Suspension B
115	Dealer Prohibited Business Practices	69W- 600.013(1)(h)3, 17 CFR 230.419	Blank Check Offerings	Fine C to Fine D, Restriction, Suspension A to Suspension C	Fine D, Suspension B to Suspension C, Revocation, Bar	Fine D, Suspension B to Suspension C, Revocation, Bar
116	Dealer Prohibited Business Practices	69W- 600.013(1)(h)3, 17 CFR 230.481	Information Required in a Prospectus	Notice of Non- Compliance, Fine B to Fine C, Restriction, Suspension A to Suspension C	Fine B to Fine C, Restriction, Suspension B to Suspension C	Fine B to Fine D, Restriction, Suspension C, Revocation
117	Dealer Prohibited Business Practices	69W- 600.013(1)(h)3, 17 CFR 230.482	Advertising by an Investment Company	Notice of Non- Compliance, Fine A to Fine C, Restriction	Fine A to Fine C, Restriction	Fine C to Fine D, Suspension A to Suspension B
118	Dealer Prohibited Business Practices	69W- 600.013(1)(h)4, 17 CFR 242.200- 242.203, FINRA Rule 4320	Short Sale Delivery Requirements	Notice of Non- Compliance, Fine B to Fine C, Restriction, Suspension A	Fine C to Fine D, Restriction, Suspension A to Suspension C	Fine D, Suspension B to Suspension C, Revocation, Bar

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Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
119	Dealer Prohibited Business Practices	69W- 600.013(1)(h)5, Section 15B of the Securities Exchange Act of 1934, MSRB Definitional Rules D1- 12, MSRB General Rules G-1 through G- 6, G- 11 through G- 14, G-17 through G-28, G-30 through G- 33, G-37, G-38	Prohibited Business Practices for Dealers and Their Associated Persons	Notice of Non-Compliance, Fine B to Fine D, Restriction	Fine B to Fine D, Suspension A	Fine B to Fine D, Suspension B to Suspension C
120	Dealer Prohibited Business Practices	69W- 600.013(1)(h)5, MSRB General Rules G-7 through G-9	Books and Records	Notice of Non- Compliance, Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar	Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar	Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar
121	Dealer Prohibited Business Practices	69W- 600.013(1)(h)5, MSRB General Rule G-10	Investor and Municipal Advisory Client Education and Protection	Notice of Non- Compliance, Fine A	Fine A	Fine B, Suspension A
122	Dealer Prohibited Business Practices	69W- 600.013(1)(h)5, MSRB General Rule G-15	Confirmation, Clearance, Settlement and Other Uniform Practice Requirements with Respect to Transactions with Customers	Notice of Non- Compliance, Fine A	Fine A	Fine B, Suspension A
123	Dealer Prohibited Business Practices	69W- 600.013(1)(h)5, MSRB General Rule G-29	Availability of Board Rules	Notice of Non- Compliance, Fine A	Fine A	Fine B, Suspension A
124	Dealer Prohibited Business Practices	69W- 600.013(1)(h)5, MSRB General Rule G-34	CUSIP Numbers, New Issue, and Market Information Requirements	Notice of Non- Compliance, Fine A	Fine A	Fine B, Suspension A
125	Dealer Prohibited Business Practices	69W- 600.013(1)(h)5, MSRB General Rule G-39	Telemarketing	Notice of Non- Compliance, Fine A to Fine B, Restriction	Fine B to Fine D, Restriction	Fine D

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Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
126	Dealer Prohibited Business Practices	69W- 600.013(1)(h)5, MSRB General Rule G-41	Anti-Money Laundering Compliance Program	Notice of Non- Compliance, Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar
127	Dealer Prohibited Business Practices	69W- 600.013(1)(h)6, Regulation S-P 17 C.F.R. §248.30	Procedures to Safeguard Customer Records and Information	Notice of Non- Compliance, Fine B to Fine D, Restriction, Suspension A to Suspension C, Revocation, Bar	Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine D, Revocation, Bar
128	Dealer Prohibited Business Practices	69W- 600.013(1)(h)7., Regulation Best Interest	Best Interest Standard of Conduct	Fine C – Fine D, Restriction, Suspension A – Suspension C, Revocation, Bar	Fine D, Restriction, Suspension C, Revocation, Bar	Fine D, Restriction, Revocation, Bar
129	Dealer Prohibited Business Practices	69W- 600.013(1)(i)	Prospectuses	Notice of Non- Compliance, Fine B to Fine C	Fine B to Fine D, Suspension A to Suspension B	Fine C to Fine D, Restriction, Suspension C
130	Dealer Prohibited Business Practices	69W- 600.013(1)(j)	Using Unregistered Clearing Dealer	Notice of Non- Compliance, Fine C to Fine D, Restriction	Fine C to Fine D, Suspension A to Suspension B	Fine D, Restriction, Suspension C
131	Dealer Prohibited Business Practices	69W- 600.013(1)(k)	Recommending Use of an Unregistered Investment Adviser	Notice of Non- Compliance, Fine B to Fine D, Restriction	Fine C to Fine D, Suspension A to Suspension B, Restriction	Fine D, Restriction, Suspension C
132	Dealer Prohibited Business Practices	69W- 600.013(1)(l)	Receiving Compensation from an Adviser	Notice of Non- Compliance, Fine B to Fine D, Restriction	Fine C to Fine D, Suspension A to Suspension B, Restriction	Fine D, Restriction, Suspension C, Revocation
133	Dealer Prohibited Business Practices	69W- 600.013(1)(m)	Sale of Non-Exempt Securities	Notice of Non- Compliance, Fine A to Fine C, Restriction, Suspension A to Suspension C	Fine A to Fine C, Restriction, Suspension B to Suspension C, Bar	Fine B to Fine D, Restriction, Suspension C, Revocation, Bar
134	Dealer Prohibited Business Practices	69W- 600.013(1)(m) Section 13 of the Securities Exchange Act of 1934	Periodic and Other Reports	Notice of Non- Compliance, Fine C to Fine D	Fine D	Fine D

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Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
135	Dealer Prohibited Business Practices	69W- 600.013(1)(m) Section 15D of the Securities Exchange Act of 1934	Securities Analyst and Research Reports	Notice of Non- Compliance, Fine C to Fine D, Restriction, Suspension A to Suspension C, Revocation	Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine D, Restriction, Suspension C, Revocation, Bar
136	Dealer Prohibited Business Practices	69W- 600.013(1)(n)	Providing False Client Data	Notice of Non-Compliance, Fine C to Fine D, Suspension B to Suspension C, Restriction, Revocation, Bar	Fine C to Fine D, Suspension B to Suspension C, Restriction, Revocation, Bar	Fine D, Revocation, Bar
137	Dealer Prohibited Business Practices	69W- 600.013(1)(o)	Senior - Specific Certifications and Professional Designations	Notice of Non-Compliance, Fine C to Fine D, Suspension A to Suspension B, Restriction	Fine C to Fine D, Suspension B to Suspension C, Restriction, Revocation, Bar	Fine D, Revocation, Bar
138	Dealer Prohibited Business Practices	69W- 600.013(1)(p)	Failure to deliver a current Form CRS to any retail investor	Notice of Non- Compliance, Fine A to Fine B	Fine A to Fine B	Fine A to Fine B
139	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(a)	Borrowing from or Lending to Customers	Notice of Non- Compliance, Fine B to Fine C, Restriction, Suspension A to Suspension C	Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar
140	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(b) – (f)	Demonstrations of Unworthiness	Fine C to Fine D, Suspension A to Suspension C, Revocation	Fine C to Fine D, Revocation, Bar	Fine C to Fine D, Revocation, Bar
141	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(g)	Failure to Provide Florida Guide to Small Business Investments (SCOR)	Notice of Non- Compliance, Fine A to Fine B	Fine A to Fine B	Fine A to Fine B
142	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(h) - [(1)(a)]	Extension of Credit	Notice of Non- Compliance, Fine B to Fine C	Fine B to Fine D, Suspension A to Suspension B, Revocation	Fine C to Fine D, Suspension B to Suspension C, Revocation, Bar
143	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(h) - [(1)(b)]	Margin Agreement	Notice of Non- Compliance, Fine B to Fine C	Fine B to Fine D, Suspension A to Suspension B, Restriction	Fine C to Fine D, Suspension B to Suspension C, Revocation, Bar

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Statutory authority: Fine – Section 517.191(9), Florida Statutes; Restriction – Section 517.161, Florida Statutes; Suspension, Revocation – Section 517.111 and 517.161, Florida Statutes; Summary Suspension – Section 517.121 and 517.1202, Florida Statutes; Bar – Section 517.191(10), Florida Statutes

Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
144	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(h) - [(1)(e)]	Failing to Execute an Order	Notice of Non- Compliance, Fine B to Fine D, Restriction	Fine B to Fine D, Suspension A to Suspension C, Restriction	Fine D, Suspension A to Suspension C, Revocation, Bar
145	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(h) - [(1)(f)]	Unregistered Securities	Notice of Non- Compliance, Fine A to Fine C, Restriction, Suspension A to Suspension C	Fine A to Fine C, Restriction, Suspension B to Suspension C, Bar	Fine B to Fine D, Restriction, Suspension C, Revocation, Bar
146	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(h) - [(1)(g)]	Representation of Qualifications	Notice of Non- Compliance, Fine C to Fine D, Restriction	Fine C to Fine D, Suspension B to Suspension C, Restriction, Revocation	Fine B to Fine D, Restriction, Suspension C, Revocation, Bar
147	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(h) - [(1)(j)]	Using Unregistered Clearing Dealer	Notice of Non- Compliance, Fine C to Fine D, Restriction, Suspension A to Suspension C	Fine C to Fine D, Suspension A to Suspension C	Fine D, Restriction, Suspension C, Revocation
148	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(h) - [(1)(k)]	Recommending Use of an Unregistered Investment Adviser	Notice of Non- Compliance, Fine B to Fine D, Restriction	Fine C to Fine D, Suspension A to Suspension B, Restriction	Fine D, Restriction, Suspension C
149	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(h) - [(1)(l)]	Receiving Compensation from an Adviser	Notice of Non- Compliance, Fine B to Fine D, Restriction	Fine C to Fine D, Suspension A to Suspension B, Restriction	Fine D, Restriction, Suspension C
150	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(h) - [(1)(m)]	Sale of Non-Exempt Securities	Notice of Non- Compliance, Fine A to Fine C, Restriction, Suspension A to Suspension C	Fine A to Fine C, Restriction, Suspension B to Suspension C, Bar	Fine B to Fine D, Restriction, Suspension C, Revocation, Bar
151	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(h) - [(1)(n)]	Providing False Client Data	Notice of Non-Compliance, Fine C to Fine D, Suspension B to Suspension C, Restriction, Revocation, Bar	Fine C to Fine D, Suspension B to Suspension C, Restriction, Revocation, Bar	Fine D, Revocation, Bar

Suspension A = Up to 5 days; Suspension B = 6 to 30 days; Suspension C = over 30 days

Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
152	Dealer Agent Prohibited Business Practices	69W- 600.013(2)(h) - [(1)(o)]	Senior - Specific Certifications and Professional Designations	Notice of Non-Compliance, Fine C to Fine D, Suspension A to Suspension B, Restriction	Fine C to Fine D, Suspension B to Suspension C, Restriction, Revocation, Bar	Fine D, Revocation, Bar
153	Adviser/Agent Prohibited Business Practices	69W- 600.0131(1)(a) (15 USC 80b-4)	Reports by Investment Advisers	Notice of Non-Compliance, Fine A to Fine B, Suspension B to Suspension C, Summary Suspension, Revocation, Bar	Fine A to Fine C, Suspension B to Suspension C, Summary Suspension, Revocation, Bar	Fine B to Fine D, Suspension B to Suspension C, Summary Suspension, Revocation, Bar
154	Adviser/Agent Prohibited Business Practices	69W- 600.0131(1)(a) (15 USC 80b- 4a)	Prevention of Misuse of Nonpublic Information	Notice of Non- Compliance, Fine A to Fine C, Restriction, Suspension A to Suspension C	Fine A to Fine C, Restriction, Suspension B to Suspension C, Bar	Fine B to Fine D, Restriction, Suspension C, Revocation, Bar
155	Adviser/Agent Prohibited Business Practices	69W- 600.0131(1)(a) (15 USC 80b-5)	Investment Advisory Contracts	Notice of Non- Compliance, Restriction, Fine B to Fine D	Fine B to Fine D, Suspension A to Suspension B	Fine C to Fine D, Suspension B to Suspension C
156	Adviser/Agent Prohibited Business Practices	69W- 600.0131(1)(a) (15 USC 80b-6)	Prohibited Transactions by Investment Advisers	Fine D, Revocation, Bar	Fine D, Revocation, Bar	Fine D, Revocation, Bar
157	Adviser/Agent Prohibited Business Practices	69W- 600.0131(1)(a) (15 USC 80b-7)	Material Misstatement	Denial, Restriction, Suspension, Summary Suspension, Revocation, Bar	Denial, Restriction, Suspension, Summary Suspension, Revocation, Bar	Denial, Restriction, Suspension, Summary Suspension, Revocation, Bar
158	Adviser/Agent Prohibited Business Practices	69W- 600.0131(1)(a) (15 USC 80b-8)	General Prohibitions	Fine D, Revocation, Bar	Fine D, Revocation, Bar	Fine D, Revocation, Bar
159	Adviser/Agent Prohibited Business Practices	69W- 600.0131(1)(a) (17 CFR 275.204-1 and 17 CFR 275.204-3)	Amendments to Form ADV and Delivery of Brochures and Supplements	Notice of Non- Compliance, Fine A to Fine B	Fine A to Fine C, Suspension A to Suspension B	Fine B to Fine D, Suspension B to Suspension C, Revocation, Bar
160	Adviser/Agent Prohibited Business Practices	69W- 600.0131(1)(a) (17 CFR 275.205-1, 17 CFR 275.205-2, and 17 CFR 275.205-3)	Contracts	Notice of Non- Compliance, Fine A to Fine B	Fine A to Fine C, Suspension A	Fine C to Fine D, Suspension B to Suspension C, Revocation, Bar

Suspension A = Up to 5 days; Suspension B = 6 to 30 days; Suspension C = over 30 days

Statutory authority: Fine – Section 517.191(9), Florida Statutes; Restriction – Section 517.161, Florida Statutes; Suspension, Revocation – Section 517.111 and 517.161, Florida Statutes; Summary Suspension – Section 517.121 and 517.1202, Florida Statutes; Bar – Section 517.191(10), Florida Statutes

Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
161	Adviser/Agent Prohibited Business Practices	69W- 600.0131(1)(a) (17 CFR 275.206(3)-1, 17 CFR 275.206(3)-2, 17 CFR 275.206(4)-1, and 17 CFR 275.206(4)-3)	Prohibited Transactions	Notice of Non-Compliance, Fine B to Fine D, Suspension A to Suspension C, Revocation, Bar	Fine A to Fine D, Suspension A to Suspension C, Revocation, Bar	Fine B to Fine D, Suspension B to Suspension C, Revocation, Bar
162	Adviser/Agent Prohibited Business Practices	69W- 600.0131(1) (paragraphs (b), (d), (f), (g), (i), (j), (k), (l), (n), (o), (p), (t), (u), (v), (w), and (x))	Prohibited Business Practices for Investment Advisers and Their Associated Persons	Notice of Non- Compliance, Fine B to Fine D, Restriction, Suspension A to Suspension C, Revocation, Bar	Fine D, Restriction, Suspension B to Suspension C, Revocation, Bar	Fine D, Revocation, Bar
163	Adviser/Agent Prohibited Business Practices	69W- 600.0131(1) (paragraphs (c), (e), (h), (m), (q), (r), and (s))	Prohibited Business Practices for Investment Advisers and Their Associated Persons	Notice of Non- Compliance, Restriction, Fine B to Fine D	Fine B to Fine D, Suspension A to Suspension B	Fine C to Fine D, Suspension B to Suspension C
164	Adviser Custody Requirements	69W- 600.0132(2)	Custody Requirements for Investment Advisers	Notice of Non- Compliance, Fine B to Fine D, Suspension A to Suspension C	Fine C to Fine D, Restriction, Suspension B to Suspension C	Fine D, Suspension C, Revocation, Bar
165	Dealer/Adviser/ Agent Business Practices	69W- 600.0133(1)	Use of Senior Specific Certifications or Senior Specific Professional Designations by Associated Persons and Investment Advisers	Notice of Non-Compliance, Fine C to Fine D, Suspension A to Suspension B, Restriction	Fine C to Fine D, Suspension B to Suspension C, Restriction, Revocation, Bar	Fine D, Revocation, Bar
166	Dealer Books and Records	69W-600.014(1)	Books and Records Requirements	Notice of Non-Compliance, Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar	Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar	Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar
167	Adviser Books and Records	69W-600.014(2)	Books and Records Requirements	Notice of Non- Compliance, Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar	Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar	Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar

Suspension A = Up to 5 days; Suspension B = 6 to 30 days; Suspension C = over 30 days

Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
168	Dealer /Adviser Books and Records	69W-600.014(6)	Books and Records Preservation Requirements	Notice of Non- Compliance, Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar	Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar	Fine A to Fine B, Suspension B to Suspension C, Revocation, Bar
169	Dealer and Financial Reporting	69W-600.0151	Net Capital Requirements for Dealers	Notice of Non-Compliance, Fine A to Fine D, Restriction, Suspension A to Suspension B, Revocation	Fine B to Fine D, Suspension A to Suspension C, Revocation	Fine C to Fine D, Suspension B to Suspension C, Revocation, Bar
170	Adviser Financial Reporting	69W-600.0161	Net Capital and Financial Reporting Requirements for Investment Advisers	Notice of Non-Compliance, Fine A to Fine C, Restriction, Suspension A to Suspension B, Revocation	Fine B to Fine D, Suspension A to Suspension C, Revocation	Fine C to Fine D, Suspension B to Suspension C, Revocation, Bar
171	Dealer Financial Reporting	69W-600.017	Customer Protection Rule - Reserve Requirements and Custody of Customer Funds and Securities	Fine C to Fine D, Restriction, Suspension A	Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar
172	Securities Registration	69W-700.009	Escrow of Proceeds from Sale of Securities	Fine C to Fine D	Fine C to Fine D, Suspension A to Suspension B	Fine D, Suspension C, Revocation, Bar
173	Securities Registration	69W-700.012(5)	Oil and Gas Participation Plans	Notice of Non-Compliance, Fine C to Fine D, Suspension B to Suspension C, Restriction, Revocation, Bar	Fine D, Restriction, Suspension B to Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar
174	Securities Registration	69W-700.015	Offering Price of Equity Securities	Notice of Non- Compliance, Fine C to Fine D	Fine C to Fine D, Suspension A to Suspension B	Fine D, Suspension C, Revocation, Bar
175	Securities Registration	69W-700.020	Termination Date of Registration, Prospectuses not to be Used after Certain Date	Notice of Non- Compliance, Fine A to Fine B	Fine B to Fine C	Fine D
176	Dealer Books and Records	69W-700.021	Independent Transfer Agent and/or Registrar	Notice of Non- Compliance, Fine A to Fine C	Fine B to Fine C	Fine D

Suspension A = Up to 5 days; Suspension B = 6 to 30 days; Suspension C = over 30 days

Statutory authority: Fine – Section 517.191(9), Florida Statutes; Restriction – Section 517.161, Florida Statutes; Suspension, Revocation – Section 517.111 and 517.161, Florida Statutes; Summary Suspension – Section 517.121 and 517.1202, Florida Statutes; Bar – Section 517.191(10), Florida Statutes

Violation #	Violation Category	Statute or Code	Short Description	1st Occurrence	2nd Occurrence	3rd and Subsequent Occurrence(s)
177	Dealer Securities Registration	69W-700.027	Loans and Other Affiliated Transactions	Fine C to Fine D, Suspension B to Suspension C, Revocation	Fine D, Suspension C, Revocation, Bar	Fine D, Suspension C, Revocation, Bar
178	Securities Registration	69W-700.030	Advertising and Sales Literature	Notice of Non- Compliance, Fine A	Fine A to Fine B, Restriction, Suspension A	Fine A to Fine C, Restriction, Suspension B
179	Issuer Securities Registration	69W-900.001	Disclosure of Business Activities in Cuba	Notice of Non- Compliance, Fine B to Fine C	Fine B to Fine D	Fine D, Suspension B to Suspension C, Revocation

Suspension A = Up to 5 days; Suspension B = 6 to 30 days; Suspension C = over 30 days