

Name: Alert ID: TMML2024035103376 The Financial Industry Regulatory Authority has sanctioned San Antonio broker-dealer Braymen, Lambert and Noel Securities Ltd. and one of its principals. FINRA, the securities industry's self-policing organization, censured and fined Braymen, Lambert and Noel Securities, or BLNS, \$70,000. FINRA also fined firm partner Shannon Braymen \$20,000 and suspended her for a month. BLNS and Braymen consented to the sanctions without admitting or denying FINRA's findings. "I did nothing wrong," Braymen said in an interview. "No clients were hurt. No monies were lost. No complaints were filed." Neither Braymen nor the firm has any prior formal disciplinary history with FINRA. FINRA found BLNS failed to actively supervise the firm's participation in nine private placement offerings from April 2007 to November 2011. "Specifically, the firm had no documentation of principal review and approval of any of the offering documents for the nine offerings (and) no documentation that a principal of the firm had conducted due diligence on any of the offerings," according to a "Letter of Acceptance, Waiver and Consent" that Braymen submitted to FINRA. The letter also said the firm lacked customer subscription documents that were required to determine customers' suitability for the investments. Braymen said she had been doing business the same way for 13 years before FINRA conducted an audit in November 2011. "They said I didn't do secondary due diligence on private placements, which I didn't need to do because the due diligence was already done, and nobody was complaining or losing money." The analysis had been completed by numerous lawyers and analysts, she added. "No red flags were raised, and all of a sudden FINRA says, 'You're doing it wrong and we're going to fine you,'" she said. "I felt blindsided." She said a more appropriate response from FINRA would have been "a slap on the hand." The private placements involved various medical-related companies. Among them, Braymen said, were cancer drug developer Azaya Therapeutics and medical device manufacturer BiO2 Medical Inc., both of San Antonio. BLNS also operated two unregistered branch offices in San Antonio and Austin, FINRA said.