**BD Number: 141391** 

# **FORM BD** UNIFORM APPLICATION FOR BROKER-DEALER REGISTRATION

**Primary Business Name: BOUSTEAD SECURITIES, LLC** 

**BD - AMENDMENT** 03/31/2021

#### **BD - APPLICANT INFORMATION**

OMB Number	3235-0012	
Expires	August 31, 2019	
Estimated average burden hour	s per:	
Response	2.75	
Amendment	0.33	
1		

WARNING: Failure to keep this form current and to file accurate supplementary information on a timely basis, or the failure to keep accurate books and records or otherwise to comply with the provisions of law applying to the conduct of business as a broker-dealer would violate the Federal securities laws and the laws of the jurisdictions and may result in disciplinary, administrative, injunctive or criminal action.

#### INTENTIONAL MISSTATEMENTS OR OMISSIONS OF FACTS MAY CONSTITUTE CRIMINAL VIOLATIONS.

## ○ APPLICATION AMENDMENT

- 1. Exact name, principal business address, mailing address, if different, and telephone number of applicant:
  - A. Full name of applicant(if sole proprietor, state last, first and middle name): BOUSTEAD SECURITIES, LLC
  - B. IRS Empl. Ident. No.:

20-4882456

- C. (1) Name under which broker-dealer business primarily is conducted, if different from Item 1A. BOUSTEAD SECURITIES, LLC
  - (2) List on Schedule D, Page 1, Section I, Other Business Names any other name by which the firm conducts business and where it is used.
- D. If this filing makes a name change on behalf of the applicant, enter the new name and specify whether the name change is of the

 $\square$  applicant name (1A) or  $\square$  business name (1C):

Please check above.

E. Firm main address: (Do not use a P.O. Box)

Number and Street 1: Number and Street 2:

6 VENTURE SUITE 395

City: State: Country: Zip/Postal Code:

IRVINE California

F. Mailing Address, if different:

**Number and Street 1:** Number and Street 2:

6 VENTURE SUITE 395

Citv: Country: Zip/Postal Code: State:

IRVINE California USA 92618

G. Business Telephone Number:

949-295-1580

H. Contact Employee:

Name: Title: **Telephone Number:** 

CHIEF COMPLIANCE OFFICER 310-955-4814 JOANNE PARK

#### **BD - EXECUTION**

#### **EXECUTION:**

For the purposes of complying with the laws of the State(s) designated in Item 2 relating to either the offer or sale of securities or commodities, the undersigned and applicant hereby certify that the applicant is in compliance with applicable state surety bonding requirements and irrevocably appoint the administrator of each of those State(s) or such other person designated by law, and the successors in such office, attorney for the applicant in said State(s), upon whom may be served any notice, process, or pleading in any action or proceeding against the applicant arising out of or in connection with the offer or sale of securities or commodities, or out of the violation or alleged violation of the laws of those State(s), and the applicant hereby consents that any such action or proceeding against the applicant may be commenced in any court of competent jurisdiction and proper venue within said State(s) by service of process upon said appointee with the same effect as if applicant were a resident in said State(s) and had lawfully been served with process in said State(s).

The applicant consents that service of any civil action brought by or notice of any proceeding before the Securities and Exchange Commission or any self-regulatory organization in connection with the applicant's broker-dealer activities, or of any application for a protective decree filed by the Securities Investor Protection Corporation, may be given by registered or certified mail or confirmed telegram to the applicant's contact employee at the main address, or mailing address if different, given in Items 1E and 1F.

The undersigned, being first duly sworn, deposes and says that he/she has executed this form on behalf of, and with the authority of, said applicant. The undersigned and applicant represent that the information and statements contained herein, including exhibits attached hereto, and other information filed herewith, all of which are made a part hereof, are current, true and complete. The undersigned and applicant further represent that to the extent any information previously submitted is not amended such information is currently accurate and complete.

<b>Date MM/DD/YYYY</b> 03/31/2021	Name of Applicant BOUSTEAD SECURITIES,	LLC			
Authorized Signatory JOANNE PARK	Title CCO				
Subscribed and sworn before me this day of		 Year	by		
Notary Public					
My commission expires County of	State of				
BD - SECURITIES AND	EXCHANGE COMMISSIO	N			
2. Indicate by checking the appropriate box(es) each gove which the <i>applicant</i> is registered or registering as a broke		ization, or j	<i>jurisdiction</i> ir	ı 🔽	
If applicant is registered or registering with the SEC, chec	k here and answer Items 2	A through	2D below.		
				YES	NO
A. Is <i>applicant</i> registered or registering as a broker-deale Securities Exchange Act of 1934?	r under Section 15(b) or Se	ection 15B	of the	•	0
B. Is <i>applicant</i> registered or registering as a broker-deale Act of 1934 and also acting or intending to act as a government.			s Exchange	•	0
C. Is <i>applicant</i> registered or registering <u>solely</u> as a govern 15C of the Securities Exchange Act of 1934?	nment securities broker or o	dealer unde	er Section	0	•
Do not answer "yes" to Item 2C if applicant answered	yes" to Item 2A or Item 2	В.			

D. Is applicant ceasing its activities as a government securities broker or dealer?

If applicant answers "yes" to Items 2A and 2D, applicant expressly consents to the withdrawal of its registration as a government securities broker or dealer under Section 15C of the Securities Exchange Act of 1934. See "Instructions."

#### **SECURITY FUTURES PRODUCTS ACTIVITIES**

(Note: The field below is reserved exclusively for the reporting of single stock futures activities by registered brokerdealers. This field cannot be utilized until the SEC approves rules relating to the form and content of such reporting.)

### **BD - SRO / JURISDICTION**

	BD - SELF REGULATORY ORGANIZATIONS								
<b>☑</b> FINRA	CBOE BZX	☐ ISE		MIAX OPTIONS	☐ NYSE-CHI				
□ BOX	CBOE C2	☐ ISE GEMX		NQX	☐ NYSE-NAT				
□ BX	CBOE EDGA	☐ ISE MRX		NYSE	☐ NqLX				
☐ CBOE	☐ CBOE EDGX	LTSE		NYSE-AMER	☐ PHLX				
☐ CBOE BYX	☐ IEX	□ MEMX		NYSE-ARCA	☐ MIAX PEARL				
					☐ MIAX EMERALD				
		BD - JURISD	ICTION						
<b>☑</b> Alabama	<b>☑</b> Illinois		✓ Montana		✓ Puerto Rico				
✓ Alaska	<b>☑</b> Indiana		✓ Nebraska		✓ Rhode Island				
✓ Arizona	<b>☑</b> Iowa		✓ Nevada		▼ South Carolina				
✓ Arkansas	<b>☑</b> Kansas		✓ New Ham	npshire	✓ South Dakota				
☑ California	<b>☑</b> Kentuck	У	✓ New Jers		▼ Tennessee				
▼ Colorado	Louisian	a	✓ New Mex	rico	<b>☑</b> Texas				
Connecticut	Maine		✓ New York	<	<b>☑</b> Utah				
☐ Delaware	Marylan	d	☑ North Ca	rolina	☐ Vermont				
☑ District of Columbia	Massach	usetts	☑ North Da	ikota	☐ Virgin Islands				
▼ Florida	Michigar	1	Ohio		✓ Virginia				
☑ Georgia	Minneso	ta	Oklahom	а	✓ Washington				
<b>☑</b> Hawaii	☐ Mississip	pji	☑ Oregon		West Virginia				
☐ Idaho	Missouri		☑ Pennsylva	ania	✓ Wisconsin				
					Wyoming				

		BD - LEGAL ST	ATUS
3. A.	Indicate legal status of ap	pplicant:	
	C Corporation	C Sole Proprietorship	Other (specify)
	C Partnership	<b>⊙</b> Limited Liability Company	
В.	Month applicant's fiscal year	ear ends:	
C.			licant obtained its legal status (i.e., state or country d, or where applicant entity was formed):
	State of formation: California	Country of formation: USA	Date of formation: MM/DD/YYYY 04/19/2006
	Schedule A, Direct Owner	s and Executive Officers Section a	and, if applicable, Schedule B, Indirect Owners

Section must be completed as part of all initial applications. Amendments to these schedules must be provided

on Schedule C.

4.	If applicant is a sole proprietor, state full resider	nce address a	nd Social Sec	curity Number.		
s	ocial Security Number:					
N	lumber and Street 1: Num	nber and Str	eet 2:			
C	ity: Stat	:e: Co	untry:	Zip/Postal Code:		
	•		,	<b>F</b> ,		
	В	O - SUCCESS	ION		YES	NO
_	- "				1 63	NO
5.	Is applicant at the time of this filing succeeding t	to the busines	ss of a curren	tly registered broker-dealer?	$\circ$	⊙
	Do not report previous successions already repor	ted on Form	BD.			
	If "Yes," contact CRD prior to submitting form; consection III.	omplete appr	opriate items	on Schedule D, Page 1,		
	BD -	- ARRANGEN	IENTS			
		ARROLL			Yes	No No
6	Does <i>applicant</i> hold or maintain any funds or sec	curities or pro	vide clearing	services for any other broker or	_	
0.	dealer?	diffics of pro	vide ciedinig	scivices for any other broker of	О	⊙
,—						
7.	Does applicant refer or introduce customers to a	ny other brok	er or dealer?		$_{\odot}$	0
	If "yes," complete appropriate items on Schedule	e D, Page 1, S	Section IV, Ari	rangement Detail.		
,						
8.	Does applicant have any arrangement with any c	other <i>person</i> ,	firm, or orga	nization under which:		
	A. any books or records of applicant are kept or	maintained b	y such other <i>j</i>	person, firm or organization?	•	
				· · · · · · · · · · · · · · · · · · ·	٠	
	B. accounts, funds, or securities of the <i>applicant</i> organization?	are neid or n	naintained by	such other <i>person</i> , firm, or	О	⊙
	C. accounts, funds, or securities of customers of <i>person</i> , firm, or organization?	the <i>applicant</i>	are held or n	naintained by such other	0	•
	For purposes of 8B and 8C, do not include a b paragraph(c) of Rule 15c3-3 under the Securior If "Yes" to any part of Item 8, complete approarment Detail.	ties Exchange	Act of 1934	(17 CFR 240. 15c3-3).		
	Door any person not named in Them 1 or Calcalin	loc A P ar C	directly or !-	ndiractly		
Э.	Does any <i>person</i> not named in Item 1 or Schedu		-	•		
	A. <i>control</i> the management or policies of the <i>app</i>	<i>licant</i> throug	n agreement	or otherwise?	О	⊙
	B. wholly or partially finance the business of app	licant?			O	⊙
	Do not answer "yes" to 9B if the person finance offering of securities made pursuant to the Se					

course of business by suppliers, banks, and others; or 3) a satisfactory subordination agreement, as defined in Rule 15c3-1 under the Securities Exchange Act of 1934 (17 CFR 240. 15c3-1). If "Yes" to any part of Item 9, complete appropriate items on Schedule D, Page 1, Section IV, Arrangement Detail.

#### RD - RUSTNESS AFFTI TATES

	BD - Control Affiliates		
		YES	NO
С	Directly or indirectly, does <i>applicant control</i> , is <i>applicant controlled</i> by, or is <i>applicant</i> under common control with, any partnership, corporation, or other organization that is engaged in the securities or nvestment advisory business?	•	0
I	f "Yes" to Item 10A, complete appropriate items on Schedule D, Page 2, Section V, Firm Affiliates.		
n	Directly or indirectly, is <i>applicant controlled</i> by any 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?	0	•
I	f "Yes" to Item 10B, complete appropriate items on Schedule D, Page 3, Section VI, Bank Affiliates.		

BD - DISCLOSURE QUESTIONS		
11. Use the appropriate DRP for providing details to "yes" answers to the questions in Item 11. Refer to the Explanation of Terms section of Form BD Instructions for explanations of italicized terms.		
CRIMINAL DISCLOSURE		
A. In the past ten years has the applicant or a control affiliate:	YES	NO
(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign or military court to any felony?	O	$\odot$
(2) been <i>charged</i> with any <i>felony</i> ?	0	$\odot$
B. In the past ten years has the applicant or a control affiliate:		
(1) been convicted of or pled guilty or nolo contendere ("no contest") in a domestic, foreign or military court to a misdemeanor involving: investments or an investment-related business, or any fraud, false statements or omissions, wrongful taking of property, bribery, perjury, forgery, counterfeiting, extortion, or a conspiracy to commit any of these offenses?	0	⊚
(2) been charged with a misdemeanor specified in 11B(1)?	$\circ$	$\odot$
REGULATORY ACTION DISCLOSURE		
C. Has the U.S. Securities and Exchange Commission or the Commodity Futures Trading Commission ever:	YES	NO
(1) found the applicant or a control affiliate to have made a false statement or omission?	0	•
(2) found the applicant or a control affiliate to have been involved in a violation of its regulations or statutes?	0	$\odot$
(3) found the applicant or a control affiliate to have been a cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	O	$\odot$
(4) entered an <i>order</i> against the <i>applicant</i> or a <i>control affiliate</i> in connection with an <i>investment-related</i> activity?	O	$\odot$
(5) imposed a civil money penalty on the <i>applicant</i> or a <i>control affiliate</i> , or <i>ordered</i> the <i>applicant</i> or a <i>control affiliate</i> to cease and desist from any activity?	O	$\odot$
D. Has any other federal regulatory agency, any state regulatory agency, or foreign financial regulatory authority:		
(1) ever found the applicant or a control affiliate to have made a false statement or omission or been dishonest, unfair, or unethical?	0	$\odot$
(2) ever found the applicant or a control affiliate to have been involved in a violation of investment-related regulations or statutes?	0	⊙

	web CRD - BD Print Preview » All Pages [User Name: joannepark, OrgiD: 141591]		
	(3) ever <i>found</i> the <i>applicant</i> or a <i>control affiliate</i> to have been a cause of an <i>investment-related</i> business having its authorization to do business denied, suspended, revoked, or restricted?	О	$\odot$
	(4) in the past ten years, entered an <i>order</i> against the <i>applicant</i> or a <i>control affiliate</i> in connection with an <i>investment-related</i> activity?	O	$\odot$
	(5) ever denied, suspended, or revoked the <i>applicant</i> 's or a <i>control affiliate</i> 's registration or license or otherwise, by <i>order</i> , prevented it from associating with an <i>investment-related</i> business or restricted its activities?	0	•
E.	Has any self-regulatory organization or commodities exchange ever:		
	(1) found the applicant or a control affiliate to have made a false statement or omission?	0	•
	(2) found the applicant or a control affiliate to have been involved in a violation of its rules (other than a violation designated as a "minor rule violation" under a plan approved by the U.S. Securities and Exchange Commission)?	•	O
	(3) found the applicant or a control affiliate to have been the cause of an investment-related business having its authorization to do business denied, suspended, revoked, or restricted?	0	•
	(4) disciplined the <i>applicant</i> or a <i>control affiliate</i> by expelling or suspending it from membership, barring or suspending its association with other members, or otherwise restricting its activities?	0	•
F.	Has the <i>applicant's</i> or a <i>control affiliate's</i> authorization to act as an attorney, accountant, or federal contractor ever been revoked or suspended?	0	•
G.	Is the <i>applicant</i> or a <i>control affiliate</i> now the subject of any regulatory <i>proceeding</i> that could result in a "yes" answer to any part of 11C, D, or E?	0	•
	CIVIL JUDICIAL ACTION DISCLOSURE		
Н.	(1) Has any domestic or foreign court:	VEC	NO
	(1) Has any domestic or foreign court.	ILS	110
	(a) in the past ten years, <i>enjoined</i> the <i>applicant</i> or a <i>control affiliate</i> in connection with any <i>investment-related</i> activity?	C	•
	(a) in the past ten years, enjoined the applicant or a control affiliate in connection with any	_	_
	<ul><li>(a) in the past ten years, enjoined the applicant or a control affiliate in connection with any investment-related activity?</li><li>(b) ever found that the applicant or a control affiliate was involved in a violation of investment-</li></ul>	0	•
	<ul> <li>(a) in the past ten years, enjoined the applicant or a control affiliate in connection with any investment-related activity?</li> <li>(b) ever found that the applicant or a control affiliate was involved in a violation of investment-related statutes or regulations?</li> <li>(c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought</li> </ul>	0	0
	<ul> <li>(a) in the past ten years, enjoined the applicant or a control affiliate in connection with any investment-related activity?</li> <li>(b) ever found that the applicant or a control affiliate was involved in a violation of investment-related statutes or regulations?</li> <li>(c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought against the applicant or control affiliate by a state or foreign financial regulatory authority?</li> <li>(2) Is the applicant or a control affiliate now the subject of any civil proceeding that could result in a</li> </ul>	0 0	0
	<ul> <li>(a) in the past ten years, enjoined the applicant or a control affiliate in connection with any investment-related activity?</li> <li>(b) ever found that the applicant or a control affiliate was involved in a violation of investment-related statutes or regulations?</li> <li>(c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought against the applicant or control affiliate by a state or foreign financial regulatory authority?</li> <li>(2) Is the applicant or a control affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of 11H(1)?</li> <li>FINANCIAL DISCLOSURE</li> <li>In the past ten years has the applicant or a control affiliate of the applicant ever been a securities firm or a control affiliate of a securities firm that:</li> </ul>	○ ○ ⊙ YES	© © O
	<ul> <li>(a) in the past ten years, enjoined the applicant or a control affiliate in connection with any investment-related activity?</li> <li>(b) ever found that the applicant or a control affiliate was involved in a violation of investment-related statutes or regulations?</li> <li>(c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought against the applicant or control affiliate by a state or foreign financial regulatory authority?</li> <li>(2) Is the applicant or a control affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of 11H(1)?</li> <li>FINANCIAL DISCLOSURE</li> <li>In the past ten years has the applicant or a control affiliate of the applicant ever been a securities firm or a control affiliate of a securities firm that:</li> <li>(1) has been the subject of a bankruptcy petition?</li> </ul>	o o o	<ul><li>⊙</li><li>⊙</li><li>○</li><li>○</li></ul>
I.	<ul> <li>(a) in the past ten years, enjoined the applicant or a control affiliate in connection with any investment-related activity?</li> <li>(b) ever found that the applicant or a control affiliate was involved in a violation of investment-related statutes or regulations?</li> <li>(c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought against the applicant or control affiliate by a state or foreign financial regulatory authority?</li> <li>(2) Is the applicant or a control affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of 11H(1)?</li> <li>FINANCIAL DISCLOSURE</li> <li>In the past ten years has the applicant or a control affiliate of the applicant ever been a securities firm or a control affiliate of a securities firm that:</li> <li>(1) has been the subject of a bankruptcy petition?</li> <li>(2) has had a trustee appointed or a direct payment procedure initiated under the Securities Investor Protection Act?</li> </ul>	○ ○ ⊙ YES	© © O
I.	<ul> <li>(a) in the past ten years, enjoined the applicant or a control affiliate in connection with any investment-related activity?</li> <li>(b) ever found that the applicant or a control affiliate was involved in a violation of investment-related statutes or regulations?</li> <li>(c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought against the applicant or control affiliate by a state or foreign financial regulatory authority?</li> <li>(2) Is the applicant or a control affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of 11H(1)?</li> <li>FINANCIAL DISCLOSURE</li> <li>In the past ten years has the applicant or a control affiliate of the applicant ever been a securities firm or a control affiliate of a securities firm that:</li> <li>(1) has been the subject of a bankruptcy petition?</li> <li>(2) has had a trustee appointed or a direct payment procedure initiated under the Securities Investor</li> </ul>	O O O O YES	<ul><li>⊙</li><li>○</li><li>○</li><li>NO</li><li>○</li></ul>
I.	<ul> <li>(a) in the past ten years, enjoined the applicant or a control affiliate in connection with any investment-related activity?</li> <li>(b) ever found that the applicant or a control affiliate was involved in a violation of investment-related statutes or regulations?</li> <li>(c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought against the applicant or control affiliate by a state or foreign financial regulatory authority?</li> <li>(2) Is the applicant or a control affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of 11H(1)?</li> <li>FINANCIAL DISCLOSURE</li> <li>In the past ten years has the applicant or a control affiliate of the applicant ever been a securities firm or a control affiliate of a securities firm that:</li> <li>(1) has been the subject of a bankruptcy petition?</li> <li>(2) has had a trustee appointed or a direct payment procedure initiated under the Securities Investor Protection Act?</li> </ul>	O O O O YES	<ul><li>⊙</li><li>○</li><li>○</li><li>NO</li><li>○</li><li>○</li></ul>
I.	<ul> <li>(a) in the past ten years, enjoined the applicant or a control affiliate in connection with any investment-related activity?</li> <li>(b) ever found that the applicant or a control affiliate was involved in a violation of investment-related statutes or regulations?</li> <li>(c) ever dismissed, pursuant to a settlement agreement, an investment-related civil action brought against the applicant or control affiliate by a state or foreign financial regulatory authority?</li> <li>(2) Is the applicant or a control affiliate now the subject of any civil proceeding that could result in a "yes" answer to any part of 11H(1)?</li> <li>FINANCIAL DISCLOSURE</li> <li>In the past ten years has the applicant or a control affiliate of the applicant ever been a securities firm or a control affiliate of a securities firm that:</li> <li>(1) has been the subject of a bankruptcy petition?</li> <li>(2) has had a trustee appointed or a direct payment procedure initiated under the Securities Investor Protection Act?</li> <li>Has a bonding company ever denied, paid out on, or revoked a bond for the applicant?</li> </ul>	O O O O	0 0 0 0 0 0 0 0 0

	BD - TYPES OF BUSINESS	
C	Check types of business engaged in (or to be engaged in, if not yet active) by $applicant$ . Do not check any category that accounts for (or is expected to account for) less than $1\%$ of annual revenue from the security nvestment advisory business.	
A	A. Exchange member engaged in exchange commission business other than floor activities.	□емс
E	3. Exchange member engaged in floor activities.	□емғ
(	C. Broker or dealer making inter-dealer markets in corporate securities over-the-counter.	□IDM
Г	D. Broker or dealer retailing corporate equity securities over-the-counter.	⊠BDR
E	E. Broker or dealer selling corporate debt securities.	₩BDD

H. Mutual fund retailer.  I. 1. U.S. government securities dealer. 2. U.S. government securities broker.  J. Municipal securities dealer.  K. Municipal securities broker.  L. Broker or dealer selling variable life insurance or annuities.  M. Solicitor of time deposits in a financial institution.  N. Real estate syndicator.  O. Broker or dealer selling oil and gas interests.  P. Put and call broker or dealer or option writer.  Q. Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds).  R. Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals).  S. Investment advisory services.  T. 1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.  2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)		F.	Underwriter or selling group participant (corporate securities other than mutual funds).	V	JSG
1. 1. U.S. government securities dealer. 2. U.S. government securities broker. 3. Municipal securities dealer. 4. Municipal securities broker. 5. Municipal securities broker. 6. Broker or dealer selling variable life insurance or annuities. 6. Solicitor of time deposits in a financial institution. 7. Real estate syndicator. 7. Broker or dealer selling oil and gas interests. 7. Put and call broker or dealer or option writer. 8. Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds). 8. Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals). 9. Investment advisory services. 9. Investment advisory services. 9. Investment advisory services. 9. Broker or dealer selling tax shelters or limited partnerships in primary distributions. 9. Broker or dealer selling tax shelters or limited partnerships in the secondary market. 9. U. Non-exchange member arranging for transactions in listed securities by exchange member. 9. V. Trading securities for own account. 9. W. Private placement of securities. 9. X. Broker or dealer selling interests in mortgages or other receivables. 9. Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a: 9. Loank, savings bank or association, or credit union. 9. Linsurance company or agency 9. Other (give details on Schedule D, Page 1, Section II, Other Business)  10. A. Does applicant effect transactions in commodity futures, commodities or commodity options as a broker for others or as a dealer for its own account? 10. Does applicant engage in any other non-securities business?		G.	Mutual fund underwriter or sponsor.		МFU
2. U.S. government securities broker.  J. Municipal securities dealer.  K. Municipal securities broker.  L. Broker or dealer selling variable life insurance or annuities.  M. Solicitor of time deposits in a financial institution.  N. Real estate syndicator.  O. Broker or dealer selling oil and gas interests.  P. Put and call broker or dealer or option writer.  Q. Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds).  R. Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals).  S. Investment advisory services.  T. 1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.  2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)		Н.	Mutual fund retailer.	V	MFR
J. Municipal securities dealer.  K. Municipal securities broker.  L. Broker or dealer selling variable life insurance or annuities.  M. Solicitor of time deposits in a financial institution.  N. Real estate syndicator.  O. Broker or dealer selling oil and gas interests.  P. Put and call broker or dealer or option writer.  Q. Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds).  R. Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals).  S. Investment advisory services.  T. 1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.  2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)		I.	1. U.S. government securities dealer.		GSD
K. Municipal securities broker.  L. Broker or dealer selling variable life insurance or annuities.  M. Solicitor of time deposits in a financial institution.  N. Real estate syndicator.  O. Broker or dealer selling oil and gas interests.  P. Put and call broker or dealer or option writer.  Q. Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds).  R. Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals).  S. Investment advisory services.  T. 1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.  2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)			2. U.S. government securities broker.	V	GSB
L. Broker or dealer selling variable life insurance or annuities.  M. Solicitor of time deposits in a financial institution.  N. Real estate syndicator.  O. Broker or dealer selling oil and gas interests.  P. Put and call broker or dealer or option writer.  Q. Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds).  R. Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals).  S. Investment advisory services.  T. 1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.  2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)		J.	Municipal securities dealer.		MSD
M. Solicitor of time deposits in a financial institution.  N. Real estate syndicator.  O. Broker or dealer selling oil and gas interests.  P. Put and call broker or dealer or option writer.  Q. Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds).  R. Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals).  S. Investment advisory services.  T. 1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.  2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)		K.	Municipal securities broker.		MSB
N. Real estate syndicator.  O. Broker or dealer selling oil and gas interests.  P. Put and call broker or dealer or option writer.  Q. Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds).  R. Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals).  S. Investment advisory services.  T. 1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.  2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, klosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)		L.	Broker or dealer selling variable life insurance or annuities.		/LA
O. Broker or dealer selling oil and gas interests.  P. Put and call broker or dealer or option writer.  Q. Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds).  R. Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals).  S. Investment advisory services.  T. 1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.  2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, klosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)		Μ.	Solicitor of time deposits in a financial institution.		SSL
P. Put and call broker or dealer or option writer.  Q. Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds).  R. Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals).  S. Investment advisory services.  T. 1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.  2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)		N.	Real estate syndicator.		RES
Q. Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds).  R. Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals).  S. Investment advisory services.  T. 1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.  2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)		0.	Broker or dealer selling oil and gas interests.		OGI
R. Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals).  S. Investment advisory services.  T. 1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.  2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)		Р.	Put and call broker or dealer or option writer.	V	РСВ
S. Investment advisory services.  T. 1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.  2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, klosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)		Q.	Broker or dealer selling securities of only one issuer or associate issuers (other than mutual funds).		ВІА
T. 1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.  2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)		R.	Broker or dealer selling securities of non-profit organizations (e.g., churches, hospitals).		NPB
2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.  U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)  YI  13. A. Does applicant effect transactions in commodity futures, commodities or commodity options as a broker for others or as a dealer for its own account?  B. Does applicant engage in any other non-securities business?		S.	Investment advisory services.		AD
U. Non-exchange member arranging for transactions in listed securities by exchange member.  V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)  YI  13. A. Does applicant effect transactions in commodity futures, commodities or commodity options as a broker for others or as a dealer for its own account?  B. Does applicant engage in any other non-securities business?		T.	1. Broker or dealer selling tax shelters or limited partnerships in primary distributions.		ГАР
V. Trading securities for own account.  W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)  YI  13. A. Does applicant effect transactions in commodity futures, commodities or commodity options as a broker for others or as a dealer for its own account?  B. Does applicant engage in any other non-securities business?			2. Broker or dealer selling tax shelters or limited partnerships in the secondary market.		ΓAS
W. Private placement of securities.  X. Broker or dealer selling interests in mortgages or other receivables.  Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)  YI  13. A. Does applicant effect transactions in commodity futures, commodities or commodity options as a broker for others or as a dealer for its own account?  B. Does applicant engage in any other non-securities business?		U.	Non-exchange member arranging for transactions in listed securities by exchange member.		NEX
<ul> <li>X. Broker or dealer selling interests in mortgages or other receivables.</li> <li>Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a: <ol> <li>bank, savings bank or association, or credit union.</li> <li>insurance company or agency</li> <li>Other (give details on Schedule D, Page 1, Section II, Other Business)</li> </ol> </li> <li>13. A. Does applicant effect transactions in commodity futures, commodities or commodity options as a broker for others or as a dealer for its own account?</li> <li>B. Does applicant engage in any other non-securities business?</li> </ul>		٧.	Trading securities for own account.	V	ΓRA
Y. Broker or dealer involved in a networking, kiosk or similar arrangement with a:  1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)  YI  13. A. Does applicant effect transactions in commodity futures, commodities or commodity options as a broker for others or as a dealer for its own account?  B. Does applicant engage in any other non-securities business?		W.	Private placement of securities.	V	PLA
1. bank, savings bank or association, or credit union.  2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)  YI  13. A. Does applicant effect transactions in commodity futures, commodities or commodity options as a broker for others or as a dealer for its own account?  B. Does applicant engage in any other non-securities business?		Χ.	Broker or dealer selling interests in mortgages or other receivables.		MRI
2. insurance company or agency  Z. Other (give details on Schedule D, Page 1, Section II, Other Business)  YI  13. A. Does applicant effect transactions in commodity futures, commodities or commodity options as a broker for others or as a dealer for its own account?  B. Does applicant engage in any other non-securities business?		Υ.	Broker or dealer involved in a networking, kiosk or similar arrangement with a:		
<ul> <li>Z. Other (give details on Schedule D, Page 1, Section II, Other Business)</li> <li>YI</li> <li>13. A. Does applicant effect transactions in commodity futures, commodities or commodity options as a broker for others or as a dealer for its own account?</li> <li>B. Does applicant engage in any other non-securities business?</li> </ul>			1. bank, savings bank or association, or credit union.		BNA
<ul> <li>13. A. Does applicant effect transactions in commodity futures, commodities or commodity options as a broker for others or as a dealer for its own account?</li> <li>B. Does applicant engage in any other non-securities business?</li> </ul>			2. insurance company or agency		<b>NA</b>
<ul><li>13. A. Does applicant effect transactions in commodity futures, commodities or commodity options as a broker for others or as a dealer for its own account?</li><li>B. Does applicant engage in any other non-securities business?</li></ul>		Z.	Other (give details on Schedule D, Page 1, Section II, Other Business)	<b>₩</b>	тн
<ul><li>13. A. Does applicant effect transactions in commodity futures, commodities or commodity options as a broker for others or as a dealer for its own account?</li><li>B. Does applicant engage in any other non-securities business?</li></ul>				VEC	. NO
broker for others or as a dealer for its own account?  B. Does <i>applicant</i> engage in any other non-securities business?	13.	Α.	Does applicant effect transactions in commodity futures, commodities or commodity options as a	_	_
			broker for others or as a dealer for its own account?	U	•
If "yes", describe each other business briefly on Schedule D, Page 1, Section II, Other Business.				$\odot$	О
			If "yes", describe each other business briefly on Schedule D, Page 1, Section II, Other Business.		

#### **BD - DIRECT OWNERS/EXECUTIVE OFFICERS**

Are there any indirect owners of the applicant required to be reported on Schedule B?

○ Yes ⊙ No

Ownership Codes: NA - less than 5%

B - 10% but less than 25% D - 50% but less than 75%

A - 5% but less than 10% C - 25% but less than 50% E - 75% or more

Full Legal Name	DE/FE/I	Title or Status	Date Acquired	Own. Code	Control Person	PR	CRD #(or S.S.No., IRS Tax #, Emp. ID)
BOUSTEAD & COMPANY LIMITED	DE	MEMBER	08/2016	D	N	N	81-3173977
BULL, ROBERT LEE IV	I	FINOP & PRINCIPAL & CCO	11/2017	NA	N	N	1521134
MOORE, KEITH CHARLES	I	CEO, ALTERNATE CCO & AMLCO	10/2014	NA	Υ	N	5191450
PARK, JOANNE JUNGMIN	I	CCO	02/2018	NA	Υ	N	4120874

## **BD - INDIRECT OWNERS**

## **No Information Filed**

#### BD Schedule C - Amendments to Schedules A & B

In the Type of Amd. column, indicate "A" (addition), "D" (deletion), or "C" (change of information about the same person).

Ownership Codes NA - less than 5% 25% are:

B - 10% but less than D - 50% but less than **75%** 

F - Other General **Partners** 

A - 5% but less than 10%

C - 25% but less than

E - 75% or more

50%

List below all changes to Schedule A: (DIRECT OWNERS AND EXECUTIVE OFFICERS)

Full Legal Name	DE/FE/I	Type of Amd.	Title or Status	Date Acquired	Own. Code	Control Person	PR	CRD # (or SSN, IRS Tax #, Emp. ID)
BULL, ROBERT LEE IV	I	С	FINOP & PRINCIPAL & CCO	11/2017	NA	N	N	1521134
PARK, JOANNE JUNGMIN	I	D	CCO	02/2018	NA	Y	N	4120874

List below all changes to Schedule B: (INDIRECT OWNERS)

Full Legal	DE/FE/I	Type of	Entity in Which	Status	Date	Own.	Control	PR	CRD # (or SSN,
Name		Amd.	Interest is Owned		Acquired	Code	Person		IRS Tax #, Emp.
									ID)

## No Information Filed

**BD - OTHER BUSINESS NAMES** 

No Information Filed

## **BD - OTHER BUSINESS**

#### Briefly describe any other business (Item 12Z).

UNDERWRITER OR SELLING GROUP PARTICIPANT ON A FIRM COMMITMENT OR BEST EFFORTS BASIS, MERGER AND ACQUISITION SERVICES, CREATE AND DISTRIBUTE RESEARCH, DISTRIBUTE THIRD PARTY RESEARCH, CONDUCT SECURITIES BUSINESS WITH RETAIL CUSTOMERS, INSTITUTIONAL CUSTOMERS AND BROKER DEALERS, PROPRIETARY TRADING-TRADING SECURITIES FOR ITS OWN ACCOUNT.

Briefly describe any other non-securities business (Item 13B).

OTHER ADVISORY SERVICES

	В	o - SUCCESSIO	NS		
Date of Succession: MM/DD	YYYYY Name of Pr	edecessor:			
Firm CRD Number	IRS Employ	er Identificati	on Number (if	any) SEC File 8-	Number (if any)
Briefly describe details of t	he <i>succession</i> inclu	uding any asse	ets or liabilities	not assumed b	y the <i>successor</i> .
BD	- ARRANGEMENTS	/ CONTROL P	ERSONS / FINA	ANCING	
(check one)	C Item 8A	C Item 8B	C Item 8C	C Item 9A	C Item 9B
Applicant must complete a se section including any multiple that the arrangement or agreagreement, enter the effective	responses to any ite ement became effecti	m. Complete the ive. When repor	e "Effective Date	e" box with Month	, Day and Year
Organization/Individual Notes VISION FINANCIAL MARKETS		<b>CRD N</b> 142271	umber:	⊙ Entity ○ Individua	I
Business Address					
Street 1: 120 LONG RIDGE ROAD		Street 3 NORT	<del></del>		
<b>/</b> -	State: Connecticut	<b>Count</b> i USA	·y:	Zip/Postal C 06902	ode:
Effective Date MM/DD/YYYY 12/17/2019		Termiı	nation Date мм	/DD/YYYY	
Briefly describe the nature agreement (ITEM 9A); or t				3); the nature o	f the <i>control</i> or
APPLICANT ENTERED INTO	A FULLY DISCLOSED	CARRYING AGR	EEMENT WITH \	ISION FINANCIA	L MARKETS LLC
(check one) C Item 7	⊙ Item 8A	C Item 8B	C Item 8C	C Item 9A	C Item 9B
Applicant must complete a se section including any multiple that the arrangement or agreagreement, enter the effective	responses to any ite ement became effecti	m. Complete the ive. When repor	e "Effective Date	e" box with Month	, Day and Year

	Web CRD BB Time Tie	C	N	iik, Oigii). 141371j	
<b>Organization/Individual Name:</b> SMARSH INC.		CKD	Number:	Entity	
				C Individua	n <b>l</b>
Business Address					
Street 1: 1600 ROSECRANS AVE.		<b>Stree</b> BUILD	<b>t 2:</b> DING 7 SUITE 30	00	
<b>City:</b> MANHATTAN BEACH	<b>State:</b> California	<b>Coun</b> USA	try:	Zip/Postal C 90266	ode:
Effective Date MM/DD/YYYY 07/14/2020			ination Date M	M/DD/YYYY	
Briefly describe the nature of reagreement (ITEM 9A); or the me					f the <i>control</i> or
BOUSTE	AD SECURITIES U	SES SMARS	H TO ARCHIVE	WECHAT.	
(check one) C Item 7 ©	Item 8A	Item 8B	C Item 8C	C Item 9A	C Item 9B
section including any multiple respo that the arrangement or agreement agreement, enter the effective date	became effective				
Organization/Individual Name: GLOBAL RELAY		CRD	Number:	Entity	
GEODINE RELIATI				C Individua	nl
<b>Business Address</b>					
Street 1: 286 MADISON AVE.		Stree	t 2:		
City: Stat NEW YORK New	<b>e:</b> York	<b>Coun</b> USA	try:	Zip/Postal C 10017	ode:
Effective Date MM/DD/YYYY Termination Date MM/DD/YYYY 01/03/2013					
Briefly describe the nature of re agreement (ITEM 9A); or the me					f the <i>control</i> or
BOUSTEAD	SECURITIES USE	S GLOBAL R	ELAY TO ARCHI	VE EMAILS.	

Busines	5
The details supplied relate to:  Partnership, Corporation, or Organization Name SUTTER CAPITAL PARTNERS, LLC The Partnership, Corporation, or Organization	CRD Number (if any) 288442
C controls applicant	
C is controlled by applicant	
is under common <i>control</i> with <i>applicant</i> Business Address Street 1	Street 2

6 VENTURE				SUITE 395	
City IRVINE	<b>Stat</b> Califo	_	ì	<b>Country</b> USA	<b>Zip/Postal Code</b> 92618
Effective Date (MM/DD/YYYY) 07/07/2017				Termination Da	te (MM/DD/YYYY)
Is Partnership, Corporation or Organization entity?	a for	eigr	1	If Yes, provide incorporation	country of domicile or
CYes ©No					
Activities of this Partnership, Corporation, o	or Org	janiz	zatior	n:	
Securities Activities	Oy	'es	⊙ No		
Investment Advisory Activities			○ No		
Briefly describe the <i>control</i> relationship					
SUTTER CAPITAL PARTNERS, LLC AND THE BD		JNDE Limi		E COMMON OWNE	RSHIP OF BOUSTEAD & COMPANY
	I	Busi	ness		
The details supplied relate to:					
<b>Partnership, Corporation, or Organization N</b> SUTTER SECURITIES CLEARING, LLC	ame			CRD Number (if 134742	fany)
The Partnership, Corporation, or Organizati	on				
C controls applicant					
is controlled by applicant					
<ul><li>is under common control with applicant Business Address</li></ul>	•				
Street 1 6 VENTURE				Street 2 SUITE 395	
City	State	_		Country	Zip/Postal Code
IRVINE  Effective Date (MM/DD/YYYY)  08/24/2017	Califo	OFFIIA	1	UNITED STATES  Termination Da	92618 te (MM/DD/YYYY)
Is Partnership, Corporation or Organization entity?	a for	eigr	1	If Yes, provide of incorporation	country of domicile or
CYes ® No				incorporation	
Activities of this Partnership, Corporation, o	or Oro	iani	zatior	1:	
Securities Activities					
Investment Advisory Activities			○ No		
-	Су	'es	<b>⊙</b> No		
Briefly describe the <i>control</i> relationship SUTTER SECURITIES CLEARING, LLC, THROUG SUTTER SECURITIES GROUP, INC. AND BOUST CONTROL OF	EAD S	SECU	JRITIE		•
	ı	Busi	ness		
The details supplied relate to:					
<b>Partnership, Corporation, or Organization N</b> FLASHFUNDERS FUNDING PORTAL, LLC	ame			CRD Number (if 283102	fany)
The Partnership, Corporation, or Organizati	on				
C controls applicant					
is controlled by applicant					
<ul><li>is under common control with applicant Business Address</li></ul>					
Street 1				Street 2	

6 VENTURE			SUITE 395	
City	State		Country	Zip/Postal Code
IRVINE	Californi	a	UNITED STATES	92618
Effective Date (MM/DD/YYYY) 08/24/2017			Termination Date (MM)	(DD/YYYY)
Is Partnership, Corporation or Organization entity?	a foreig	n	If Yes, provide country incorporation	y of domicile or
CYes ⊙No				
Activities of this Partnership, Corporation, o	or Organ	izatio	1:	
Securities Activities	⊙ Yes	CNo		
<b>Investment Advisory Activities</b>	O Yes	⊙ No		
Briefly describe the control relationship FLASHFUNDERS FUNDING PORTAL, LLC, THROU SUTTER SECURITIES GROUP, INC. AND BOUST CONTROL OF	EAD SEC	URITIE		
	Bus	iness		
The details supplied relate to:				
<b>Partnership, Corporation, or Organization N</b> INITIATE ADVISORS LLC	ame		CRD Number (if any) 182513	
The Partnership, Corporation, or Organizati	on			
C controls applicant				
is controlled by applicant				
<ul><li>is under common control with applicant Business Address</li></ul>	•			
Street 1			Street 2	
6 VENTURE			SUITE 395	
City IRVINE	<b>State</b> Californi	a	<b>Country</b> UNITED STATES	<b>Zip/Postal Code</b> 92618
Effective Date (MM/DD/YYYY) 08/24/2017			Termination Date (MM)	(DD/YYYY)
Is Partnership, Corporation or Organization entity?	a foreig	n	If Yes, provide country incorporation	y of domicile or
CYes ⊙No				
Activities of this Partnership, Corporation, o	or Organ	izatio	n:	
Securities Activities	O Yes	No		
Investment Advisory Activities	<b>⊙</b> Yes	○ No		
Briefly describe the control relationship INITIATE ADVISORS LLC, IS OWNED BY SUTT COMPANY LIMITED WHICH BY COMMON OWNED LLC WHICH IS ALSO OT	RSHIP AN	D CON		H BOUSTEAD SECURITIES,
	Bus	iness		
The details supplied relate to:				
Partnership, Corporation, or Organization N SUTTER SECURITIES INCORPORATED	ame		CRD Number (if any) 30770	
The Partnership, Corporation, or Organizati	on			
C controls applicant				
is controlled by applicant				
<ul><li>is under common control with applicant Business Address</li></ul>				

1/2021	Web CRD - BD I II	int I review # 7th I age	s [Osci Ivaine, Joannepa	ark, Orgid. 141371j
Street 1			Street 2	
220 MONTGOMERY STREET City		State	SUITE 468 Country	Zip/Postal Code
SAN FRANCISCO		California	USA	94104
Effective Date (MM/DD/YYY) 03/07/2019	<b>(Y)</b>		Termination D	Pate (MM/DD/YYYY)
Is Partnership, Corporation entity?	on or Organization	a foreign	If Yes, provide incorporation	e country of domicile or
CYes ⊙No				
<b>Activities of this Partners</b>	hip, Corporation, o	or Organizatio	n:	
Securities Activities		Yes ○ No	ı	
Investment Advisory Acti	vities	C Yes ⊙No	1	
	RPORATED, THROUGAND BOUSTEAD SEC		RE UNDER THE C	BY ITS PARENT COMPANY, SUTTER COMMON OWNERSHIP AND CONTROL
		BD - BRANCH	IEC	
	No T	nformation		
	140 1	mormatic	Jii Fileu	
	E	BD - CRIMINAL	. DRP	
		No Information	Filed	
	BD - RI	EGULATORY A	CTION DRP	
This Disclosure Reporting Pagaffirmative responses to <i>Itel</i> Check item(s) being responses	ns 11C, 11D, 11E,			sponse used to report details for
		Regulatory Ac	tion	
□11C(1)	□11C(5)	-	LD(4)	□11E(3)
□11C(2)	□11D(1)	<b>□</b> 1:	LD(5)	□11E(4)
□11C(3)	□11D(2)		LE(1)	□11F
□11C(4)	□11D(3)		LE(2)	□11 <b>G</b>
	event or <i>proceeding</i>	g. An event or <i>p</i>		e reported for more than one person
	same event. If an ev			1E, 11F or 11G. Use only one DRP to e than one regulator, provide details
It is not a requirement that on not be accepted as disclosur				. Should they be provided, they will
If a <i>control affiliate</i> is an individual or organization registered through the CRD, such <i>control affiliate</i> need only complete Part I of the <i>applicant's</i> appropriate DRP (BD). Details of the event must be submitted on the <i>control affiliate's</i> appropriate DRP (BD) or DRP (U4). If a <i>control affiliate</i> is an individual or organization <u>not</u> registered through the CRD, provide complete answers to all the items on the <i>applicant's</i> appropriate DRP (BD). The completion of this DRP does not relieve the <i>control affiliate</i> of its obligation to update its CRD records.				
PART I				
A. The <i>person(s)</i> or entity(ie	s) for whom this DR	P is being filed i	s (are):	
ិ The <i>Applicant</i>				
O Applicant and one of	or more control aff	iliatos		

• One or more control affiliates

BD DRP - Control Affiliate

If this DRP is being filed for a control affiliate, give the full name of the control affiliate below (for individuals, Last name, First name, Middle name).

If the control affiliate is registered with the CRD, provide the CRD number. If not, indicate "non-registered" by checking the appropriate checkbox.

-		CRD#	Registered
Si	JTTER SECURITIES INCORPORATED	30770	Υ
a	This DRP should be removed from the BD record because the <i>co</i> ssociated with the BD.	ntrol affiliate	(s) are no longer
3.	If the <i>control affiliate</i> is registered through the CRD, has the <i>control affiliate</i> BD DRP to the CRD System for the event? If the answer is "Yes," no other provided.		
	€ Yes C No		
	<b>NOTE:</b> The completion of this form does <u>not</u> relieve the <i>control affiliate</i> or records.	of its obligation	to update its CRD
ΆΙ	RT II		
1.	Regulatory Action initiated by:		
	CSEC COther Federal CState CSRO CForeign (Full name of regulator, foreign financial regulatory authority, federal, state	ate, or <i>SRO</i> )	
2.	Principal Sanction:		
	Other Sanctions:		
3.	Date Initiated (MM/DD/YYYY):  C Exact C Explanation  If not exact, provide explanation:		
4.	Docket/Case Number:		
5.	Control Affiliate Employing Firm when activity occurred which led to the r	regulatory actio	on (if applicable):
5.	Principal Product Type:		
	Other Product Types:		
7.	Describe the allegations related to this regulatory action. (The information	on must fit with	in the space provided.)
3.	Current status ? C Pending C On Appeal C Final		
9.	If on appeal, regulatory action appealed to: (SEC, SRO, Federal or State	Court) and Da	te Appeal Filed:
f F	inal or On Appeal, complete all items below. For Pending Actions,	complete Ite	m 13 only.

10. How was matter resolved:				
11. Resolution Date (MM/DD/YYYY):				
©Exact ©Explanation				
If not exact, provide explanation:				
12. Resolution Detail:				
A. Were any of the following Sanct	ions Ordered? (Check all appropriate items):			
☐ Monetary/Fine	Amount: \$			
Revocation/Expulsion/De	enial Disgorgement/Restitution			
□ Censure	☐Cease and Desist/Injunction			
□Bar	☐ Suspension			
B. Other Sanctions Ordered:				
<ul> <li>C. Sanction detail: if suspended, enjoined or barred, provide duration including start date and capacities affected (General Securities Principal, Financial Operations Principal, etc.). If requalification by exam/retraining was a condition of the sanction, provide length of time given to requalify/retrain, type of exam required and whether condition has been satisfied. If disposition resulted in a fine, penalty, restitution, disgorgement or monetary compensation, provide total amount, portion levied against applicant or control affiliate, date paid and if any portion of penalty was waived:</li> <li>13. Provide a brief summary of details related to the action status and (or) disposition and include relevant terms,</li> </ul>				
conditions and dates. (The informa	tion must fit within the space provided.)			
	BD - CIVIL JUDICIAL DRP			
This Disclosure Reporting Page (DRP BE affirmative responses to <i>Item 11H</i> of F	o) is an <b>INITIAL OR AMENDED</b> response used to report details for Form BD;			
Check item(s) being responded to:				
	Civil Judicial			
□11H(1)(a)	□11H(1)(b) □11H(1)(c) ☑11H(2)			
Use a separate DRP for each event or por entity using one DRP. File with a cor	proceeding. An event or proceeding may be reported for more than one person inpleted Execution Page.			
	e affirmative answer to Item 11H. Use only one DRP to report details related cial actions must be reported on separate DRPs.			
It is not a requirement that documents not be accepted as disclosure in lieu of	be provided for each event or <i>proceeding</i> . Should they be provided, they will answering the questions on this DRP.			
	organization registered through the CRD, such control affiliate need only			
affiliate's appropriate DRP (BD) or DRP through the CRD, provide complete ans	opriate DRP (BD). Details of the event must be submitted on the <i>control</i> (U4). If a <i>control affiliate</i> is an individual or organization <u>not</u> registered swers to all the items on the <i>applicant's</i> appropriate DRP (BD). The completion affiliate of its obligation to update its CRD records.			
affiliate's appropriate DRP (BD) or DRP through the CRD, provide complete ans	(U4). If a <i>control affiliate</i> is an individual or organization <u>not</u> registered swers to all the items on the <i>applicant's</i> appropriate DRP (BD). The completion			
affiliate's appropriate DRP (BD) or DRP through the CRD, provide complete and of this DRP does not relieve the <i>control</i>	(U4). If a <i>control affiliate</i> is an individual or organization <u>not</u> registered swers to all the items on the <i>applicant's</i> appropriate DRP (BD). The completion affiliate of its obligation to update its CRD records.			
affiliate's appropriate DRP (BD) or DRP through the CRD, provide complete and of this DRP does not relieve the control PART I	(U4). If a <i>control affiliate</i> is an individual or organization <u>not</u> registered swers to all the items on the <i>applicant's</i> appropriate DRP (BD). The completion affiliate of its obligation to update its CRD records.			
affiliate's appropriate DRP (BD) or DRP through the CRD, provide complete and of this DRP does not relieve the control PART I  A. The person(s) or entity(ies) for whom	(U4). If a control affiliate is an individual or organization not registered swers to all the items on the applicant's appropriate DRP (BD). The completion affiliate of its obligation to update its CRD records.  In this DRP is being filed is (are):			
affiliate's appropriate DRP (BD) or DRP through the CRD, provide complete and of this DRP does not relieve the control PART I  A. The person(s) or entity(ies) for whom  The Applicant	(U4). If a control affiliate is an individual or organization not registered swers to all the items on the applicant's appropriate DRP (BD). The completion affiliate of its obligation to update its CRD records.  In this DRP is being filed is (are):			

	If this DRP is being filed for a <i>control affiliate</i> , give the full name of the <i>control affiliate</i> below (for individuals, Last name, First name, Middle name).  If the <i>control affiliate</i> is registered with the CRD, provide the CRD number. If not, indicate "non-registered" by checking the appropriate checkbox.
ā	$\Box$ This DRP should be removed from the BD record because the <i>control affiliate(s)</i> are no longer associated with the BD.
В.	If the <i>control affiliate</i> is registered through the CRD, has the <i>control affiliate</i> submitted a DRP (with Form U4) or BD DRP to the CRD System for the event? If the answer is "Yes," no other information on this DRP must be provided.
	○ Yes ○ No
	<b>NOTE:</b> The completion of this form does <u>not</u> relieve the <i>control affiliate</i> of its obligation to update its CRD records.
PΑ	RT II
1.	Court Action initiated by: (Name of regulator, <i>foreign financial regulatory authority, SRO</i> , commodities exchange, agency, firm, private plaintiff, etc.) PRIVATE PLAINTIFFS
2.	Principal Relief Sought: Money Damages (Private/Civil Complaint) Other Relief Sought:
3.	Filing Date of Court Action (MM/DD/YYYY):
	12/06/2018   Exact   Explanation  If not exact, provide explanation:  THE FIRM INTENDS TO STRENUOUSLY DEFEND ITS ACTIONS ON THE BASIS THAT THE ALLEGATIONS ARE WITHOUT MERIT AND A SUBSTANTIAL NUMBER OF PLAINTIFFS WERE NEVER CUSTOMERS OF THE FIRM. THE FIRM WILL FILE MOTIONS TO DISMISS CHARGES AND EXPUNGE THE CLAIM FROM ITS RECORD.
4.	Principal Product Type: Other
	Other Product Types: PRIVATE PLACEMENTS
5.	Formal Action was brought in (include name of Federal, State or Foreign Court, Location of Court - City or County and State or Country, Docket/Case Number): IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PA, CASE NO. GD-18-015969
6.	Control Affiliate Employing Firm when activity occurred which led to the civil judicial action (if applicable):
7.	Describe the allegations related to this civil action. (The information must fit within the space provided.) THE ALLEGATIONS CLAIM FALSE REPRESENTATION ABOUT THE ISSUER.
8.	Current Status? • Pending On Appeal Final
9.	If on appeal, action appealed to (provide name of court): Date Appeal Filed (MM/DD/YYYY):
10	. If pending, date notice/process was served (MM/DD/YYYY):
	12/06/2018

WITHOUT MERIT AND A SUBSTANTIAL NUMBER OF PLAINTIFFS WERE NEVER CUSTOMERS OF THE FIRM. THE FIRM WILL FILE MOTIONS TO DISMISS CHARGES AND EXPUNGE THE CLAIM FROM ITS RECORD.

If Final or On Appeal, complete all items below. For Pend	ing Actions, complete Item	14 only.
11. How was matter resolved:		
12. Resolution Date (MM/DD/YYYY):  © Exact © Explanation		
If not exact, provide explanation:		
13. Resolution Detail:		
A. Were any of the following Sanctions Ordered or Relief G	ranted? (Check appropriate iter	ms):
☐ Monetary/Fine	Amount: \$	
Revocation/Expulsion/Denial	□ Disgorgement/Restitution	n
Censure	☐Cease and Desist/Injunct	tion
□Bar	☐ Suspension	
B. Other Sanctions:		
C. Sanction detail: if suspended, <i>enjoined</i> or barred, proving affected (General Securities Principal, Financial Operation exam/retraining was a condition of the sanction, provide exam required and whether condition has been satisfied disgorgement or monetary compensation, provide total <i>affiliate</i> , date paid and if any portion of penalty was wait	ons Principal, etc.). If requalificate length of time given to requal d. If disposition resulted in a find amount, portion levied against	ation by ify/retrain, type of e, penalty, restitution,
14. Provide a brief summary of circumstances related to action disclosed above. (The information must fit within the space THE FIRM INTENDS TO STRENUOUSLY DEFEND ITS ACTION WITHOUT MERIT AND A SUBSTANTIAL NUMBER OF PLAINT FIRM WILL FILE MOTIONS TO DISMISS CHARGES AND EXP	e provided.) NS ON THE BASIS THAT THE AL TFFS WERE NEVER CUSTOMERS	LEGATIONS ARE S OF THE FIRM. THE
This Disclosure Reporting Page (DRP BD) is an ${f C}$ <b>INITIAL OR</b> affirmative responses to <b>Item 11H</b> of Form BD;	<b>⊙ AMENDED</b> response used t	o report details for
Check item(s) being responded to:		
Civil Judio	ial	
Use a separate DRP for each event or <i>proceeding</i> . An event or or entity using one DRP. File with a completed Execution Page.	$\Box$ <b>11H(1)(c)</b> proceeding may be reported for	<b>☑11H(2)</b> r more than one <i>person</i>
One event may result in more than one affirmative answer to I to the same event. Unrelated civil judicial actions must be repo		report details related
It is not a requirement that documents be provided for each exnot be accepted as disclosure in lieu of answering the question		be provided, they will
If a control affiliate is an individual or organization registered to complete Part I of the applicant's appropriate DRP (BD). Detail affiliate's appropriate DRP (BD) or DRP (U4). If a control affiliath through the CRD, provide complete answers to all the items or of this DRP does not relieve the control affiliate of its obligation.	s of the event must be submitte te is an individual or organization the <i>applicant's</i> appropriate DR	ed on the <i>control</i> on <u>not</u> registered
PART I		

A. The *person(s)* or entity(ies) for whom this DRP is being filed is (are):

	• The Applic	cant can a can
	C Applicant	and one or more <i>control affiliates</i>
	One or mo	re control affiliates
	name, First nam If the <i>control at</i>	eing filed for a <i>control affiliate</i> , give the full name of the <i>control affiliate</i> below (for individuals, Last ne, Middle name).  Filiate is registered with the CRD, provide the CRD number. If not, indicate "non-registered" by propriate checkbox.
ā	☐ This DRP shassociated wit	nould be removed from the BD record because the <i>control affiliate(s)</i> are no longer h the BD.
В.		offiliate is registered through the CRD, has the control affiliate submitted a DRP (with Form U4) or CRD System for the event? If the answer is "Yes," no other information on this DRP must be
	C Yes ⊙ No	
	<b>NOTE:</b> The correcords.	mpletion of this form does <u>not</u> relieve the <i>control affiliate</i> of its obligation to update its CRD
PΑ	RT II	
1.		nitiated by: (Name of regulator, <i>foreign financial regulatory authority, SRO,</i> commodities exchange, private plaintiff, etc.) NTIFF
2.	Principal Relief Money Damag Other Relief So	es (Private/Civil Complaint)
3.	Filing Date of (	Court Action (MM/DD/YYYY):
		Exact C Explanation rovide explanation:
4.	Principal Produ Other Other Product PRIVATE PLAC	Types:
5.	and State or C	was brought in (include name of Federal, State or Foreign Court, Location of Court - City or County ountry, Docket/Case Number): CY COURT FOR THE WESTERN DISTRICT OF PA CASE NO. 18-24070-GLT
6.		e Employing Firm when activity occurred which led to the civil judicial action (if applicable): CURITIES, LLC
7.		llegations related to this civil action. (The information must fit within the space provided.)  ACTING AS THE TRUSTEE OF ONEJET ALLEGING EXCESSIVE COMMISSIONS.
8.	Current Status	? • Pending
9.	If on appeal, a	ction appealed to (provide name of court): Date Appeal Filed (MM/DD/YYYY):

10. If pending, date notice/process was served (MM	I/DD/YYYY):		
10/16/2020 • Exact Explanation			
If not exact, provide explanation:  If Final or On Appeal, complete all items below. For Pending Actions, complete Item 14 only.			
		11. How was matter resolved:	
		12. Resolution Date (MM/DD/YYYY):	
© Exact © Explanation			
If not exact, provide explanation:			
42 5 1 11 5 1 11			
13. Resolution Detail:			
A. Were any of the following Sanctions Ordered			
☐ Monetary/Fine	Amount: \$		
$\square$ Revocation/Expulsion/Denial	☐Disgorgement/Restitution		
☐ Censure	☐Cease and Desist/Injunction		
□Bar	Suspension		
B. Other Sanctions:			
affected (General Securities Principal, Finance exam/retraining was a condition of the sancte exam required and whether condition has be	arred, provide duration including start date and capacities cial Operations Principal, etc.). If requalification by tion, provide length of time given to requalify/retrain, type of een satisfied. If disposition resulted in a fine, penalty, restitution, rovide total amount, portion levied against applicant or control alty was waived:		
disclosed above. (The information must fit withi THE FIRM INTENDS TO STRENUOUSLY DEFEND	ed to action(s), allegation(s), disposition(s) and/or finding(s) in the space provided.) ITS ACTIONS ON THE BASIS THAT THE ALLEGATIONS ARE S TO DISMISS CHARGES AND EXPUNGE THE CLAIM FROM ITS		

**BD - BANKRUPTCY DRP** 

No Information Filed

**BD - BOND DRP** 

No Information Filed

**BD - JUDGMENT LIEN DRP** 

No Information Filed