

BrokerCheck Report

BOUSTEAD SECURITIES, LLC

CRD# 141391

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About BrokerCheck®

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

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

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

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

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

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
 - o information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
 - o information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

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

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

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

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

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

Thank you for using FINRA BrokerCheck.



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

brokercheck.finra.org



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

For more information about FINRA, visit www.finra.org.



BOUSTEAD SECURITIES, LLC

CRD# 141391

SEC# 8-67384

Main Office Location

6 VENTURE
SUITE 395
IRVINE, CA 92618
Regulated by FINRA Los Angeles Office

Mailing Address

6 VENTURE
SUITE 395
IRVINE, CA 92618

Business Telephone Number

949-295-1580

Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm is classified as a limited liability company.
This firm was formed in California on 04/19/2006.
Its fiscal year ends in December.

Firm History

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

Firm Operations

This firm is registered with:

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

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

This firm conducts 9 types of businesses.

This firm is affiliated with financial or investment institutions.

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

Disclosure Events

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

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

The following types of disclosures have been reported:

Type	Count
Civil Event	2



Firm Profile

This firm is classified as a limited liability company.

This firm was formed in California on 04/19/2006.

Its fiscal year ends in December.

Firm Names and Locations

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

BOUSTEAD SECURITIES, LLC

Doing business as BOUSTEAD SECURITIES, LLC

CRD# 141391

SEC# 8-67384

Main Office Location

6 VENTURE
SUITE 395
IRVINE, CA 92618

Regulated by FINRA Los Angeles Office

Mailing Address

6 VENTURE
SUITE 395
IRVINE, CA 92618

Business Telephone Number

949-295-1580



Firm Profile

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

Direct Owners and Executive Officers

Legal Name & CRD# (if any):	BOUSTEAD & COMPANY LIMITED
Is this a domestic or foreign entity or an individual?	Domestic Entity
Position	MEMBER
Position Start Date	08/2016
Percentage of Ownership	50% but less than 75%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	BULL, ROBERT LEE IV 1521134
Is this a domestic or foreign entity or an individual?	Individual
Position	FINOP & PRINCIPAL
Position Start Date	11/2017
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	MOORE, KEITH CHARLES 5191450
Is this a domestic or foreign entity or an individual?	Individual
Position	CEO, ALTERNATE CCO & AMLCO
Position Start Date	10/2014

Firm Profile



Direct Owners and Executive Officers (continued)

Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No
<hr/>	
Legal Name & CRD# (if any):	PARK, JOANNE JUNGMIN 4120874
Is this a domestic or foreign entity or an individual?	Individual
Position	CCO
Position Start Date	02/2018
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Firm Profile

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

Indirect Owners

No information reported.



Firm History

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

No information reported.





Firm Operations

Registrations

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

This firm is currently registered with the SEC, 1 SRO and 44 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	01/19/2007

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

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

A government securities broker or dealer only: No

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

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	01/19/2007



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alabama	Approved	11/22/2016
Alaska	Approved	06/27/2016
Arizona	Approved	02/12/2007
Arkansas	Approved	06/01/2017
California	Approved	01/22/2007
Colorado	Approved	07/28/2016
Connecticut	Approved	05/01/2013
District of Columbia	Approved	06/04/2020
Florida	Approved	06/22/2011
Georgia	Approved	08/22/2013
Hawaii	Approved	03/05/2018
Illinois	Approved	03/21/2014
Indiana	Approved	11/27/2017
Iowa	Approved	07/15/2016
Kansas	Approved	03/13/2018
Kentucky	Approved	01/29/2018
Louisiana	Approved	07/13/2011
Maine	Approved	03/21/2018
Maryland	Approved	08/24/2011
Massachusetts	Approved	04/25/2012
Michigan	Approved	07/03/2017
Minnesota	Approved	10/19/2011
Missouri	Approved	04/12/2018
Montana	Approved	02/12/2018
Nebraska	Approved	01/30/2018
Nevada	Approved	11/07/2007
New Hampshire	Approved	02/22/2018
New Jersey	Approved	10/16/2009
New Mexico	Approved	02/08/2017
New York	Approved	01/30/2007
North Carolina	Approved	03/24/2017
Ohio	Approved	11/15/2013
Oklahoma	Approved	01/26/2018

U.S. States & Territories	Status	Date Effective
Oregon	Approved	01/02/2013
Pennsylvania	Approved	04/27/2012
Rhode Island	Approved	01/09/2018
South Carolina	Approved	05/02/2017
Tennessee	Approved	10/31/2017
Texas	Approved	04/05/2010
Utah	Approved	10/19/2009
Virginia	Approved	01/02/2013
Washington	Approved	10/29/2009
Wisconsin	Approved	04/21/2017
Wyoming	Approved	08/06/2019



Firm Operations

Types of Business

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

This firm currently conducts 9 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter

Broker or dealer selling corporate debt securities

Underwriter or selling group participant (corporate securities other than mutual funds)

Mutual fund retailer

U S. government securities broker

Put and call broker or dealer or option writer

Trading securities for own account

Private placements of securities

Other - 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.

Other Types of Business

This firm does not effect transactions in commodities, commodity futures, or commodity options.

This firm does engage in other non-securities business.

Non-Securities Business Description: OTHER ADVISORY SERVICES

Firm Operations



Clearing Arrangements

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

Introducing Arrangements

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

Name:	VISION FINANCIAL MARKETS LLC
CRD #:	142271
Business Address:	120 LONG RIDGE ROAD 3 NORTH STAMFORD, CT 06902
Effective Date:	12/17/2019
Description:	APPLICANT ENTERED INTO A FULLY DISCLOSED CARRYING AGREEMENT WITH VISION FINANCIAL MARKETS LLC

Firm Operations

Industry Arrangements



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

Name:	SMARSH INC.
Business Address:	1600 ROSECRANS AVE. BUILDING 7 SUITE 300 MANHATTAN BEACH, CA 90266
Effective Date:	07/14/2020
Description:	BOUSTEAD SECURITIES USES SMARSH TO ARCHIVE WECHAT.

Name:	GLOBAL RELAY
Business Address:	286 MADISON AVE. NEW YORK, NY 10017
Effective Date:	01/03/2013
Description:	BOUSTEAD SECURITIES USES GLOBAL RELAY TO ARCHIVE EMAILS.

This firm does not have accounts, funds, or securities maintained by a third party.

This firm does not have customer accounts, funds, or securities maintained by a third party.

Control Persons/Financing

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

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



Firm Operations

Organization Affiliates

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

This firm is, directly or indirectly:

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

SUTTER SECURITIES INCORPORATED is under common control with the firm.

CRD #:	30770
Business Address:	220 MONTGOMERY STREET SUITE 468 SAN FRANCISCO, CA 94104
Effective Date:	03/07/2019
Foreign Entity:	No
Country:	
Securities Activities:	Yes
Investment Advisory Activities:	No
Description:	SUTTER SECURITIES INCORPORATED, THROUGH OWNERSHIP AND CONTROL BY ITS PARENT COMPANY, SUTTER SECURITIES GROUP, INC., AND BOUSTEAD SECURITIES, LLC ARE UNDER THE COMMON OWNERSHIP AND CONTROL OF BOUSTEAD & COMPANY LIMITED

INITIATE ADVISORS LLC is under common control with the firm.

CRD #:	182513
Business Address:	6 VENTURE SUITE 395 IRVINE, CA 92618
Effective Date:	08/24/2017
Foreign Entity:	No
Country:	
Securities Activities:	No

Firm Operations



Organization Affiliates (continued)

Investment Advisory Activities: Yes

Description: INITIATE ADVISORS LLC, IS OWNED BY SUTTER SECURITIES GROUP, INC. WHICH IS OWNED BY BOUSTEAD & COMPANY LIMITED WHICH BY COMMON OWNERSHIP AND CONTROL IS AFFILIATED WITH BOUSTEAD SECURITIES, LLC WHICH IS ALSO OWNED BY BOUSTEAD & COMPANY LIMITED

FLASHFUNDERS FUNDING PORTAL, LLC is under common control with the firm.

CRD #: 283102

Business Address: 6 VENTURE
SUITE 395
IRVINE, CA 92618

Effective Date: 08/24/2017

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Description: FLASHFUNDERS FUNDING PORTAL, LLC, THROUGH COMMON OWNERSHIP AND CONTROL BY ITS PARENT COMPANY, SUTTER SECURITIES GROUP, INC. AND BOUSTEAD SECURITIES, LLC ARE UNDER THE COMMON OWNERSHIP AND CONTROL OF BOUSTEAD & COMPANY LIMITED

SUTTER SECURITIES CLEARING, LLC is under common control with the firm.

CRD #: 134742

Business Address: 6 VENTURE
SUITE 395
IRVINE, CA 92618

Effective Date: 08/24/2017

Foreign Entity: No

Country:

Securities Activities: Yes

Investment Advisory Activities: No

Firm Operations



Organization Affiliates (continued)

Description: SUTTER SECURITIES CLEARING, LLC, THROUGH COMMON OWNERSHIP AND CONTROL BY ITS PARENT COMPANY, SUTTER SECURITIES GROUP, INC. AND BOUSTEAD SECURITIES, LLC ARE UNDER THE COMMON OWNERSHIP AND CONTROL OF BOUSTEAD & COMPANY LIMITED

SUTTER CAPITAL PARTNERS, LLC is under common control with the firm.

CRD #: 288442

Business Address: 6 VENTURE
SUITE 395
IRVINE, CA 92618

Effective Date: 07/07/2017

Foreign Entity: No

Country:

Securities Activities: No

Investment Advisory Activities: Yes

Description: SUTTER CAPITAL PARTNERS, LLC AND THE BD ARE UNDER THE COMMON OWNERSHIP OF BOUSTEAD & COMPANY LIMITED

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

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



Disclosure Events

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

	Pending	Final	On Appeal
Civil Event	2	0	0



Disclosure Event Details

What you should know about reported disclosure events:

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

Civil - Pending

This type of disclosure event involves a pending civil court action that with seek an injunction to cease certain investment-related activity or alleges a violation of any investment-related statute or regulation.

Disclosure 1 of 2

Reporting Source:	Firm
Current Status:	Pending
Allegations:	THE PLAINTIFF ACTING AS THE TRUSTEE OF ONEJET ALLEGING EXCESSIVE COMMISSIONS.



Initiated By: PRIVATE PLAINTIFF

Court Details: US BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PA
CASE NO. 18-24070-GLT

Date Court Action Filed: 10/16/2020

Date Notice/Process Served: 10/16/2020

Principal Product Type: Other

Other Product Types: PRIVATE PLACEMENTS

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Firm Statement THE FIRM INTENDS TO STRENUOUSLY DEFEND ITS ACTIONS ON THE BASIS THAT THE ALLEGATIONS ARE WITHOUT MERIT. THE FIRM WILL FILE MOTIONS TO DISMISS CHARGES AND EXPUNGE THE CLAIM FROM ITS RECORD.

Disclosure 2 of 2

Reporting Source: Firm

Current Status: Pending

Allegations: THE ALLEGATIONS CLAIM FALSE REPRESENTATION ABOUT THE ISSUER.

Initiated By: PRIVATE PLAINTIFFS

Court Details: IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PA, CASE NO. GD-18-015969

Date Court Action Filed: 12/06/2018

Date Notice/Process Served: 12/06/2018

Principal Product Type: Other

Other Product Types: PRIVATE PLACEMENTS

Relief Sought: Money Damages (Private/Civil Complaint)

Other Relief Sought:

Firm Statement 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.

End of Report



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