

**BrokerCheck Report**

**BRIGHT TRADING, LLC**

CRD# 34702

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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](http://brokercheck.finra.org)



For additional information about the contents of this report, please refer to the User Guidance or [www.finra.org/brokercheck](http://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](http://www.finra.org).



## BRIGHT TRADING, LLC

CRD# 34702

SEC# 8-44990

### Main Office Location

4850 HARRISON DRIVE  
LAS VEGAS, NV 89121

### Mailing Address

4850 HARRISON DRIVE  
LAS VEGAS, NV 89121

### Business Telephone Number

702-739-1393

## 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 Nevada on 07/31/2000.

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
- 3 U.S. states and territories

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

This firm conducts 1 type of business.

This firm is not affiliated with any financial or investment institutions.

This firm does not have referral or financial arrangements with other brokers or dealers.

### Disclosure Events

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

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

**The following types of disclosures have been reported:**

Type	Count
Regulatory Event	5
Arbitration	1



**Firm Profile**

This firm is classified as a limited liability company.  
This firm was formed in Nevada on 07/31/2000.  
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.

**BRIGHT TRADING, LLC**  
**Doing business as BRIGHT TRADING, LLC**  
**CRD#** 34702  
**SEC#** 8-44990

**Main Office Location**  
4850 HARRISON DRIVE  
LAS VEGAS, NV 89121

**Mailing Address**  
4850 HARRISON DRIVE  
LAS VEGAS, NV 89121

**Business Telephone Number**  
702-739-1393

**Other Names of this Firm**

Name	Where is it used
BRIGHT TRADING, LLC	CA, CO, GA, MA, MD, MO, NJ, NV, OH, TN, TX, UT



## Firm Profile

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

### Direct Owners and Executive Officers

<b>Legal Name &amp; CRD# (if any):</b>	BRIGHT INVESTMENTS, LLC
<b>Is this a domestic or foreign entity or an individual?</b>	Domestic Entity
<b>Position</b>	MANAGING MEMBER
<b>Position Start Date</b>	07/2017
<b>Percentage of Ownership</b>	25% but less than 50%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	JONES, KEN ANDO 5512985
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	TRADER
<b>Position Start Date</b>	02/2005
<b>Percentage of Ownership</b>	10% but less than 25%
<b>Does this owner direct the management or policies of the firm?</b>	No
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	CHAN, STEPHEN KEI ON 5571223
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	TRADER
<b>Position Start Date</b>	09/2008

## Firm Profile



### Direct Owners and Executive Officers (continued)

**Percentage of Ownership** 5% but less than 10%

**Does this owner direct the management or policies of the firm?** No

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** SHILLETTO, ANDREW E MR.  
4793136

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

**Position** TRADER

**Position Start Date** 03/2014

**Percentage of Ownership** 5% but less than 10%

**Does this owner direct the management or policies of the firm?** No

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** VALENTINY, CARLO ANNE JOSEPH  
5518113

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

**Position** TRADER

**Position Start Date** 05/2007

**Percentage of Ownership** 5% but less than 10%

**Does this owner direct the management or policies of the firm?** No

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** ANDERSON, DIANA ELIZABETH



## Firm Profile

### Direct Owners and Executive Officers (continued)

	4894089
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	COMPLIANCE DIRECTOR
<b>Position Start Date</b>	02/2000
<b>Percentage of Ownership</b>	Less than 5%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No
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<b>Legal Name &amp; CRD# (if any):</b>	BRIGHT, ROBERT ALVIN 1148394
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	CEO, CFO
<b>Position Start Date</b>	10/2008
<b>Percentage of Ownership</b>	Less than 5%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No
<hr/>	
<b>Legal Name &amp; CRD# (if any):</b>	FRIESEN, ROBIN DALE 5518030
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Position</b>	PRESIDENT
<b>Position Start Date</b>	02/2013
<b>Percentage of Ownership</b>	Less than 5%



## Firm Profile

### Direct Owners and Executive Officers (continued)

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

**Is this a public reporting company?** No

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**Legal Name & CRD# (if any):** ROSS, CHRISTINE ANGEL  
5512412

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

**Position** CFO, FINOP

**Position Start Date** 09/2013

**Percentage of Ownership** Less than 5%

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

**Is this a public reporting company?**

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**Legal Name & CRD# (if any):** SORGIC, SINISA  
5513001

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

**Position** TRADER

**Position Start Date** 02/2017

**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

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## Firm Profile

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

### Indirect Owners

<b>Legal Name &amp; CRD# (if any):</b>	BRIGHT, PAMELA ANN
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Company through which indirect ownership is established</b>	BRIGHT INVESTMENTS, LLC
<b>Relationship to Direct Owner</b>	MANAGING MEMBER
<b>Relationship Established</b>	02/2011
<b>Percentage of Ownership</b>	25% but less than 50%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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<b>Legal Name &amp; CRD# (if any):</b>	BRIGHT, ROBERT ALVIN
<b>Is this a domestic or foreign entity or an individual?</b>	Individual
<b>Company through which indirect ownership is established</b>	BRIGHT INVESTMENTS, LLC
<b>Relationship to Direct Owner</b>	MANAGING MEMBER
<b>Relationship Established</b>	02/2011
<b>Percentage of Ownership</b>	25% but less than 50%
<b>Does this owner direct the management or policies of the firm?</b>	Yes
<b>Is this a public reporting company?</b>	No

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## Firm History

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



**This firm was previously:** BRIGHT TRADING, INC.

**Date of Succession:** 08/31/2000

**Predecessor CRD#:** 34702

**Predecessor SEC#:** 8-44990

**Description** BRIGHT TRADING, LLC SUCCEEDED TO THE BROKER DEALER BUSINESS FORMALLY CONDUCTED BY BRIGHT TRADING, INC. ALL ASSETS WITH THE EXCEPTION OF CERTAIN ASSETS NOT PERTAINING TO THE BROKER DEALER BUSINESS AND ALL LIABILITIES WERE ASSUMED BY BRIGHT TRADING LLC. BRIGHT TRADING INC., IS MANAGING MEMBER OF BRIGHT TRADING, LLC WITH ALL VOTING AND MANAGEMENT RIGHTS IN THE COMPANY. AS SUCH, ULTIMATE CONTROL IN THE COMPANY HAS NOT CHANGED.

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## 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 3 U.S. states and territories.**

Federal Regulator	Status	Date Effective
SEC	Approved	08/21/1992

### SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: No

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
NYSE Chicago, Inc.	Approved	03/25/2000

## Firm Operations



### Registrations (continued)

U.S. States & Territories	Status	Date Effective
Colorado	Approved	08/28/1998
Nevada	Approved	02/25/1998
Pennsylvania	Approved	07/05/2002

## 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 1 type of business.**

### Types of Business

Trading securities for own account



## **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 not refer or introduce customers to other brokers and dealers.**

## Firm Operations

### Industry Arrangements



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

**Name:** GOLDMAN, SACHS & CO.  
**CRD #:** 361  
**Business Address:** 200 WEST STREET 3RD FLOOR  
NEW YORK, NY 10282  
**Effective Date:** 03/14/2016  
**Description:** GOLDMAN SACHS EXECUTION & CLEARING L.P. MIGRATED BRIGHT TRADING LLC'S ACCOUNTS TO GOLDMAN SACHS & CO. EFFECTIVE THE OPENING OF BUSINESS MARCH 14, 2016. GOLDMAN SACHS & CO. WILL CONTINUE TO CLEAR OUR TRANSACTIONS AND CARRY OUR TRADING ACCOUNT.

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

**Name:** GOLDMAN, SACHS & CO.  
**CRD #:** 361  
**Business Address:** 200 WEST STREET 3RD FLOOR  
NEW YORK, NY 10282  
**Effective Date:** 03/14/2016  
**Description:** GOLDMAN SACHS EXECUTION & CLEARING L.P. MIGRATED THE ACCOUNTS OF BRIGHT TRADING LLC TO GOLDMAN SACHS & CO. EFFECTIVE THE OPENING OF BUSINESS MARCH 14, 2016. GOLDMAN SACHS & CO. WILL CONTINUE TO CLEAR OUR TRANSACTIONS AND CARRY OUR TRADING ACCOUNT.

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**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 not, 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.**

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

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





## Disclosure Events

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

	Pending	Final	On Appeal
Regulatory Event	0	5	0
Arbitration	N/A	1	N/A



## Disclosure Event Details

### What you should know about reported disclosure events:

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

### Regulatory - Final

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

### Disclosure 1 of 5

**Reporting Source:** Regulator

**Current Status:** Final



**Allegations:** BRIGHT TRADING VIOLATED CHX ARTICLE 6, RULE 2, CHX ARTICLE 6, RULE 10, SECTION 17(F)(2) OF THE EXCHANGE ACT, AND EXCHANGE ACT RULE 17F-2, WHEN FROM ABOUT JANUARY 2012 TO AT LEAST JUNE 2012, BRIGHT TRADING PERMITTED ONE EMPLOYEE, WHO SUPERVISED TRADERS AND OTHER REGISTERED INDIVIDUALS, TO BE ENGAGED IN THE SECURITIES BUSINESS WITHOUT REGISTRATION, WITHOUT COMPLETING HIS CONTINUING EDUCATION AND WITHOUT HAVING CURRENT FINGERPRINTS ON FILE. SPECIFICALLY, THE EMPLOYEE'S REGISTRATIONS WERE INACTIVE AFTER THE FIRM FILED A FORM U5 WITH THE FINANCIAL INDUSTRY REGULATORY AUTHORITY, INC. ("FINRA") CENTRAL REGISTRATION DEPOSITORY ("CRD") FOR THE EMPLOYEE IN DECEMBER 2011, WHICH TERMINATED ALL OF THE INDIVIDUAL'S REGISTRATIONS, YET THE EMPLOYEE WAS PERMITTED TO CONTINUE TO SUPERVISE INDIVIDUAL TRADERS. BRIGHT TRADING ALSO VIOLATED CHX ARTICLE 6, RULE 5 WHEN: (A) FROM ON OR ABOUT MAY 2011 TO JUNE 2012 THE FIRM FAILED TO REASONABLY SUPERVISE A TRADER TO ENSURE THAT HE DID NOT CONTINUE TO ENGAGE IN "SPOOFING" FOR A PERIOD OF ALMOST A YEAR; (B) FROM ON OR ABOUT JANUARY 2012 TO ABOUT JUNE 2012 THE FIRM FAILED TO ENSURE THAT AN ASSOCIATED PERSON WAS REGISTERED AND HAD CURRENT FINGERPRINT CARDS WITH CRD PRIOR TO PERMITTING HIM TO ENGAGED IN THE SECURITIES BUSINESS; AND (C) FROM ON OR ABOUT FEBRUARY 2012 TO DECEMBER 2014 THE FIRM FAILED TO ESTABLISH AND MAINTAIN ADEQUATE WRITTEN SUPERVISORY PROCEDURES RELATED TO ITS "LEAVE OF ABSENCE" POLICY FOR ITS TRADERS.

**Initiated By:** CHICAGO STOCK EXCHANGE

**Date Initiated:** 08/17/2016

**Docket/Case Number:** CHX-D-2016-03

**Principal Product Type:** No Product

**Other Product Type(s):**

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

**Other Sanction(s)/Relief Sought:**

**Resolution:** Settled

**Resolution Date:** 08/17/2016



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

**Sanctions Ordered:** Monetary/Fine \$35,000.00

**Other Sanctions Ordered:**

**Sanction Details:** THE FULL AMOUNT OF THE FINE WAS ASSESSED AGAINST BRIGHT TRADING, LLC. NO PART OF THE FINE WAS WAIVED AND THE FULL FINE WAS PAID IN FULL ON AUGUST 23, 2016.

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**Reporting Source:** Firm

**Current Status:** Final

**Allegations:** VIOLATIONS OF CHX ARTICLE 6, RULE 2 AND ARTICLE 6, RULE 11 IN THAT THE FIRM PERMITTED AN ASSOCIATED PERSON TO ENGAGE IN SECURITIES ACTIVITIES WITHOUT BEING REGISTERED WITH THE FIRM OR COMPLYING WITH THE CHX CONTINUING EDUCATION REQUIREMENT FOR OVER A SIX MONTH PERIOD. VIOLATION OF CHX ARTICLE 6, RULE 10 AND SEC RULE 17F-2 IN THAT THE FIRM DID NOT RESUBMIT THE FINGERPRINT RECORD OF THE ASSOCIATED PERSON TO CRD FOR PROCESSING. VIOLATION OF CHX ARTICLE 6, RULE 5 FOR FAILING TO REASONABLY SUPERVISE A TRADER WHO ENGAGED IN SPOOFING FOR OVER A YEAR ON 4 SEPARATE OCCASIONS, FAILURE TO ENSURE THAT ITS ASSOCIATED PERSON WHO WAS MANAGING OTHER TRADERS WAS REGISTERED AND HAD A CURRENT FINGERPRINT CARD ON FILE WITH CRD AND FAILURE TO ESTABLISH AND MAINTAIN ADEQUATE WRITTEN SUPERVISORY PROCEDURES REGARDING ITS LEAVE OF ABSENCE POLICY FOR ITS TRADERS.

**Initiated By:** CHICAGO STOCK EXCHANGE

**Date Initiated:** 06/17/2016

**Docket/Case Number:** CHX-D-2016-03

**Principal Product Type:** No Product

**Other Product Type(s):**

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

**Other Sanction(s)/Relief Sought:**



**Resolution:** Decision & Order of Offer of Settlement

**Resolution Date:** 08/17/2016

**Sanctions Ordered:** Monetary/Fine \$35,000.00

**Other Sanctions Ordered:**

**Sanction Details:** BRIGHT TRADING, LLC FINED \$35,000.00. FINE PAID IN FULL ON AUGUST 19, 2016.

#### Disclosure 2 of 5

**Reporting Source:** Regulator

**Current Status:** Final

**Allegations:** BRIGHT TRADING, LLC VIOLATED CHX ARTICLE 6, RULE 2, AND CHX ARTICLE 6, RULE 11 WHEN, FROM ABOUT NOVEMBER 2010 TO ABOUT APRIL 2014, IT PERMITTED A TOTAL OF SIX TRADERS TO ENGAGED IN SECURITIES BUSINESS WHICH REQUIRED REGISTRATION WHILE THE TRADERS REGISTRATIONS WERE INACTIVE FOR FAILING TO COMPLETE CONTINUING EDUCATION REQUIREMENTS. IN ADDITION, IN APRIL 2008, CHX SHIFTED FROM PAPER REGISTRATION TO REGISTRATION WITH THE CENTRAL REGISTRATION DEPOSITORY ("WEB CRD"), AND ALL PARTICIPANTS WERE REQUIRED TO HAVE ASSOCIATED PERSONS WHO WERE ENGAGED IN SECURITIES RELATED BUSINESS COMPLETE NEW FINGERPRINT CARDS AND FILE THEM WITH WEB CRD. BRIGHT TRADING LLC VIOLATED SECTION 17(F)(2) OF THE EXCHANGE ACT AND EXCHANGE ACT RULE 17F-2 WHEN, FROM APRIL 2008 TO ABOUT FEBRUARY 2014, THE FIRM PERMITTED FIVE OTHER TRADERS TO ENGAGE IN THE SECURITIES BUSINESS WHICH REQUIRED REGISTRATION WHILE THE FIRM HAD NOT PROVIDED NEW FINGERPRINT CARDS TO WEB CRD.

BRIGHT TRADING LLC ALSO VIOLATED CHX ARTICLE 6, RULE 5(B) WHEN, FROM ON OR ABOUT APRIL 2008 TO APRIL 2014, IT PERMITTED A TOTAL OF SIX TRADERS TO ENGAGE IN ACTIVITIES WHICH REQUIRED SECURITIES REGISTRATION WHILE THEIR REGISTRATIONS WERE INACTIVE FOR FAILING TO COMPLETE THEIR CONTINUING EDUCATION REQUIREMENTS, AND FAILED TO ENSURE THAT FIVE TRADERS HAD COMPLETED FINGERPRINT CARDS AND FILED THEM WITH WEB CRD FOR A NUMBER OF YEARS, WHILE PERMITTING THEM TO ENGAGE IN ACTIVITIES WHICH REQUIRED SECURITIES REGISTRATION.

**Initiated By:** CHICAGO STOCK EXCHANGE

**Date Initiated:** 01/21/2016



<b>Docket/Case Number:</b>	CHX-D-2016-01
<b>Principal Product Type:</b>	No Product
<b>Other Product Type(s):</b>	
<b>Principal Sanction(s)/Relief Sought:</b>	Civil and Administrative Penalt(ies) /Fine(s)
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Decision & Order of Offer of Settlement
<b>Resolution Date:</b>	01/21/2016
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Sanctions Ordered:</b>	Monetary/Fine \$97,500.00
<b>Other Sanctions Ordered:</b>	
<b>Sanction Details:</b>	THE FINE CONSISTED OF A \$77,500.00 FINE AGAINST BRIGHT TRADING, LLC, AND AN ADDITIONAL \$20,000 FINE AGAINST BRIGHT TRADING AND ANOTHER INDIVIDUAL, JOINTLY AND SEVERALLY. NO PORTION OF THE FINE WAS WAIVED, AND IT WAS PAID IN FULL ON JANUARY 29, 2016.
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<b>Reporting Source:</b>	Firm
<b>Current Status:</b>	Final
<b>Allegations:</b>	<p>VIOLATIONS OF CHX ARTICLE 6, RULE 2 AND CHX ARTICLE 6, RULE 11 IN THAT THE FIRM ALLOWED SIX INDIVIDUALS TO ENGAGE IN THE SECURITIES BUSINESS OF THE FIRM WITHOUT BEING PROPERLY REGISTERED AND FAILING TO COMPLY WITH THEIR CONTINUING EDUCATION REQUIREMENTS.</p> <p>VIOLATION OF CHX ARTICLE 6, RULE 10 AND RULE 17F-2 OF THE EXCHANGE ACT BY NOT RESUBMITTING THE FINGERPRINT RECORDS OF 5 INDIVIDUALS TO THE CRD SYSTEM.</p> <p>VIOLATION OF ARTICLE 6, RULE 5 IN THAT THE FIRM AND ITS COMPLIANCE DIRECTOR FAILED TO ENSURE THAT THE ABOVE INDIVIDUALS WERE PROPERLY REGISTERED, HAD TAKEN THE REQUIRED CONTINUING EDUCATION AND HAD SUBMITTED THEIR FINGERPRINT CARDS TO CRD.</p>
<b>Initiated By:</b>	CHICAGO STOCK EXCHANGE



**Date Initiated:** 10/15/2015  
**Docket/Case Number:** CHX-D-2016-01  
**Principal Product Type:** No Product  
**Other Product Type(s):**  
**Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)  
**Other Sanction(s)/Relief Sought:**  
**Resolution:** Decision & Order of Offer of Settlement  
**Resolution Date:** 01/21/2016  
**Sanctions Ordered:** Monetary/Fine \$97,500.00  
**Other Sanctions Ordered:**  
**Sanction Details:** \$77,500.00 FINE AGAINST THE FIRM, \$20,000.00 FINE JOINTLY AND SEVERALLY AGAINST FIRM AND DIANA ANDERSON, COMPLIANCE DIRECTOR. FINE PAID IN FULL ON JANUARY 25, 2016.

### Disclosure 3 of 5

**Reporting Source:** Firm  
**Current Status:** Final  
**Allegations:** NRS 90.360(2)FROM 2007 TO 2011, CERTAIN PROPRIETARY TRADERS' RESIDENCES OR PERSONAL OFFICES WERE NOT REGISTERED AS NEVADA BRANCH OFFICES, NRS 90.310(2) CERTAIN PROPRIETARY TRADERS WERE ALLOWED TO OPERATE IN NEVADA WITHOUT BEING LICENSED AS SALES REPRESENTATIVES IN NEVADA, NRS 90.380(5) FORM U-5S FOR TERMINATED TRADERS WERE NOT FILED IN A TIMELY MANNER WITH THE DIVISION  
**Initiated By:** STATE OF NEVADA, OFFICE OF SECRETARY OF STATE, SECURITIES DIVISION  
**Date Initiated:** 03/07/2011  
**Docket/Case Number:** C110-094-JH  
**Principal Product Type:** Equity Listed (Common & Preferred Stock)  
**Other Product Type(s):**



<b>Principal Sanction(s)/Relief Sought:</b>	Civil and Administrative Penalt(ies) /Fine(s)
<b>Other Sanction(s)/Relief Sought:</b>	
<b>Resolution:</b>	Order
<b>Resolution Date:</b>	09/30/2011
<b>Sanctions Ordered:</b>	Monetary/Fine \$100,000.00
<b>Other Sanctions Ordered:</b>	UNDERTAKINGS TO PROPERLY LICENSE WITH THE DIVISION ALL PROPRIETARY TRADERS LOCATED IN NEVADA AS SALES REPRESENTATIVES AND REGISTER THEIR RESIDENCE OR PERSONAL OFFICE AS A BRANCH OFFICE. PLUS, TIMELY SUBMISSION OF ANY FORM U-5S OF TERMINATED NEVADA TRADERS WITH THE DIVISION.
<b>Sanction Details:</b>	GOING FORWARD, FIRM AGREES TO PROVIDE ADMINISTRATOR 10 DAY PRIOR NOTIFICATION IF IT WISHES TO CHANGE ITS OPERATION FROM SOLELY TRADING ITS OWN PROPRIETARY ACCOUNT TO CONDUCTING A RETAIL CUSTOMER BUSINESS, PROVIDE THE DIVISION UPON REQUEST WITH COPIES OF FINANCIAL STATEMENTS FILED WITH THE SEC AND SRO, INFORM THE DIVISION OF ANY CHANGE TO ITS SRO WITHIN 30 DAYS OF SUCH CHANGE, MANUALLY SUBMIT FORM 4S AND FORM U-5S TO THE DIVISION CONCURRENT WITH FILING WITH SRO.
<b>Firm Statement</b>	FIRM AGREES TO MANUALLY FILE A FORM BR FOR THE PRIVATE RESIDENCE OF ITS PROPRIETARY TRADERS LIVING IN THE STATE OF NEVADA WITH THE DIVISION EVEN THOUGH NOT REQUIRED UNDER ITS SRO RULES. FIRM ALSO AGREES TO MANUALLY FILE FORM U-4S AND FORM U-5S WITH THE DIVISION UNTIL SUCH TIME IT CAN CONCURRENTLY SUBMIT SUCH FILINGS TO NEVADA ALONG WITH ITS SRO THROUGH THE WEBCRD SYSTEM

#### Disclosure 4 of 5

<b>Reporting Source:</b>	Firm
<b>Current Status:</b>	Final
<b>Allegations:</b>	APPLICANT DID NOT MAINTAIN \$100,000 NET CAPITAL AT ALL TIMES, DUE TO NOT DOING A HAIRCUT CALCULATION FOR "UNDUE CONCENTRATION".
<b>Initiated By:</b>	PHILADELPHIA STOCK EXCHANGE
<b>Date Initiated:</b>	07/08/1997
<b>Docket/Case Number:</b>	<a href="#">97-06</a>





**Principal Product Type:** No Product  
**Other Product Type(s):**  
**Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)  
**Other Sanction(s)/Relief Sought:**  
**Resolution:** Decision & Order of Offer of Settlement  
**Resolution Date:** 09/16/1997  
**Sanctions Ordered:** Monetary/Fine \$2,000.00  
**Other Sanctions Ordered:**  
**Sanction Details:** \$2000 FINE PAID BY APPLICANT IN SEPTEMBER OF 1997. NO PORTION OF PENALTY WAS WAIVED.

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#### Disclosure 5 of 5

**Reporting Source:** Regulator  
**Current Status:** Final  
**Allegations:** Not Provided  
**Initiated By:** Massachusetts Securities Division  
**Date Initiated:** 11/09/1998  
**Docket/Case Number:** R-98-70  
**URL for Regulatory Action:**  
**Principal Product Type:**  
**Other Product Type(s):**  
**Principal Sanction(s)/Relief Sought:**  
**Other Sanction(s)/Relief Sought:**  
**Resolution:** Consent  
**Resolution Date:** 03/16/1999  
**Sanctions Ordered:**  
**Other Sanctions Ordered:**

**Sanction Details:**

On March 16, 1999, the Division entered a Consent Order Approving Registration Upon Conditions In The Matter of Bright Trading, Inc. - Docket # R-98-70. Bright submitted signed Undertakings and Representations and Consent to Entry of Order. Bright's application for registration in Massachusetts as a broker-dealer was approved upon the following conditions:

A) Within 30 days of the entry of the Order, Bright shall provide a copy of the Order to 1) each of the Massachusetts customers in accounts activity occurred prior to the date of of the approval of the application and/or to 2) traders with whom Bright contracted prior to the date of the approval of the application. Bright shall provide written notice to the Division with respect to its compliance with this undertaking within 45 days of the entry of the Order. B) Bright contributed thirty thousand (\$30,000.00) dollars to the Massachusetts Investors Protection Trust Fund. C) Bright shall comply with all revisions of M.G.L. c.110A and the regulations promulgated thereunder. Subject to the conditions stated above, the Administrative Complaint was dismissed and the application of Bright for registration in Massachusetts as a broker-dealer was approved.

**Regulator Statement**

CONTACT: JOE SHEEHAN (617) 727-3548

**Reporting Source:**

Firm

**Current Status:**

Final

**Allegations:**

THE LICENSING SECTION OF THE SECURITIES DIVISION ALLEGED THAT BRIGHT TRADING, INC. TRANSACTED BUSINESS IN MASSACHUSETTS WITHOUT BEING REGISTERED AS A BROKER-DEALER.

**Initiated By:**

COMMONWEALTH OF MASSACHUSETTS, SECURITIES DIVISION

**Date Initiated:**

11/09/1998

**Docket/Case Number:**

R-98-70

**Principal Product Type:**

Equity Listed (Common & Preferred Stock)

**Other Product Type(s):****Principal Sanction(s)/Relief Sought:**

Undertaking

**Other Sanction(s)/Relief Sought:****Resolution:**

Consent



**Resolution Date:** 03/16/1999

**Sanctions Ordered:**

**Other Sanctions Ordered:**

**Sanction Details:** A CONSENT ORDER APPROVING REGISTRATION UPON CONDITIONS WAS AGREED TO BY BRIGHT AND ENTERED BY THE SECURITIES DIVISION. THE ORDER APPROVED BRIGHT'S REGISTRATION AS A BROKER-DEALER. BRIGHT AGREED TO CONTRIBUTE \$30,000 TO THE MASSACHUSETTS INVESTORS PROTECTION FUND.



## Arbitration Award - Award / Judgment

Brokerage firms are not required to report arbitration claims filed against them by customers; however, BrokerCheck provides summary information regarding FINRA arbitration awards involving securities and commodities disputes between public customers and registered securities firms in this section of the report.

The full text of arbitration awards issued by FINRA is available at [www.finra.org/awardsonline](http://www.finra.org/awardsonline).

### Disclosure 1 of 1

<b>Reporting Source:</b>	Regulator
<b>Type of Event:</b>	ARBITRATION
<b>Allegations:</b>	ACCOUNT ACTIVITY-MISREPRESENTATION; ACCOUNT ACTIVITY-OMISSION OF FACTS; ACCOUNT ACTIVITY-SUITABILITY; ACCOUNT RELATED-FAILURE TO SUPERVISE
<b>Arbitration Forum:</b>	NASD
<b>Case Initiated:</b>	02/17/2000
<b>Case Number:</b>	<a href="#">00-00194</a>
<b>Disputed Product Type:</b>	DO NOT USE-NO OTHER TYPE OF SEC INVOLVE; UNKNOWN TYPE OF SECURITIES
<b>Sum of All Relief Requested:</b>	\$1,144,000.00
<b>Disposition:</b>	AWARD AGAINST PARTY
<b>Disposition Date:</b>	12/09/2002
<b>Sum of All Relief Awarded:</b>	\$6,000.00

There may be a non-monetary award associated with this arbitration.  
Please select the Case Number above to view more detailed information.

## End of Report



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