

BrokerCheck Report

MARK BEDROS BELOYAN

CRD# 1392748

Report #88057-25546, data current as of Thursday, May 5, 2016.

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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:

- 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
- 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 <http://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.



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.

Thank you for using FINRA BrokerCheck.

**MARK B. BELOYAN**

CRD# 1392748

Currently employed by and registered with the following Firm(s):**TRADESPOT MARKETS INC.**

5400 S UNIVERSITY DRIVE
STE 206 A
DAVIE, FL 33328
CRD# 29683

Registered with this firm since: 03/10/1992

TRADESPOT MARKETS INC.

5400 S University Drive
Ste 206 A
DAVIE, FL 33328
CRD# 29683

Registered with this firm since: 03/10/1992

Report Summary for this Broker

This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

Broker Qualifications**This broker is registered with:**

- 1 Self-Regulatory Organization
- 22 U.S. states and territories

This broker has passed:

- 3 Principal/Supervisory Exams
- 1 General Industry/Product Exam
- 1 State Securities Law Exam

Registration History**This broker was previously registered with the following securities firm(s):****CORPORATE SECURITIES GROUP, INC.**

CRD# 11025
ST. LOUIS, MO
01/1992 - 03/1992

SUNPOINT SECURITIES, INC.

CRD# 25442
LONGVIEW, TX
05/1990 - 01/1992

ESCALATOR SECURITIES, INC.

CRD# 16985
11/1988 - 05/1990

Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

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

The following types of disclosures have been reported:

Type	Count
Regulatory Event	2
Financial	2



Broker Qualifications

Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

This individual is currently registered with 1 SRO and is licensed in 22 U.S. states and territories through his or her employer.

Employment 1 of 1

Firm Name: **TRADESPOT MARKETS INC.**

Main Office Address: **5400 S UNIVERSITY DRIVE
STE 206 A
DAVIE, FL 33328**

Firm CRD#: **29683**

SRO	Category	Status	Date
FINRA	Financial and Operations Principal	APPROVED	03/10/1992
FINRA	General Securities Principal	APPROVED	03/10/1992
FINRA	General Securities Representative	APPROVED	03/10/1992
FINRA	Investment Banking Representative	APPROVED	12/10/2009
FINRA	Operations Professional	APPROVED	11/09/2011
FINRA	Registered Options Principal	APPROVED	11/14/2013

U.S. State/ Territory	Category	Status	Date	U.S. State/ Territory	Category	Status	Date
Arizona	Agent	APPROVED	03/27/2012	Minnesota	Agent	APPROVED	03/19/2015
California	Agent	APPROVED	10/25/1994	Montana	Agent	APPROVED	04/07/2015
Colorado	Agent	APPROVED	12/04/2002	New Jersey	Agent	APPROVED	11/24/1992
Connecticut	Agent	APPROVED	03/16/1992	New York	Agent	APPROVED	02/18/1992
Florida	Agent	APPROVED	03/10/1992	North Carolina	Agent	APPROVED	11/05/2013
Georgia	Agent	APPROVED	04/12/2006	Ohio	Agent	APPROVED	05/07/2013
Indiana	Agent	APPROVED	03/26/1999	Oklahoma	Agent	APPROVED	09/03/2002
Maryland	Agent	APPROVED	10/19/2015	Pennsylvania	Agent	APPROVED	03/11/1992



Broker Qualifications

Employment 1 of 1, continued

U.S. State/ Territory	Category	Status	Date
Texas	Agent	APPROVED	05/04/2010
Utah	Agent	APPROVED	08/30/2010
Virginia	Agent	APPROVED	02/02/2004
Washington	Agent	APPROVED	03/28/2012
Wisconsin	Agent	APPROVED	05/11/2010
Wyoming	Agent	APPROVED	08/01/2013

Branch Office Locations

TRADESPOT MARKETS INC.

5400 S University Drive
Ste 206 A
DAVIE, FL 33328



Broker Qualifications

Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below.

This individual has passed 3 principal/supervisory exams, 1 general industry/product exam, and 1 state securities law exam.

Principal/Supervisory Exams

Exam	Category	Date
Registered Options Principal Examination	Series 4	11/14/2013
General Securities Principal Examination	Series 24	05/03/1989
Financial and Operations Principal Examination	Series 27	02/03/1992

General Industry/Product Exams

Exam	Category	Date
General Securities Representative Examination	Series 7	07/20/1985

State Securities Law Exams

Exam	Category	Date
Uniform Securities Agent State Law Examination	Series 63	08/21/1985

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at www.finra.org/brokerqualifications/registeredrep/.



Registration and Employment History

Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
01/1992 - 03/1992	CORPORATE SECURITIES GROUP, INC.	11025	ST. LOUIS, MO
05/1990 - 01/1992	SUNPOINT SECURITIES, INC.	25442	LONGVIEW, TX
11/1988 - 05/1990	ESCALATOR SECURITIES, INC.	16985	
02/1986 - 10/1988	RUTHERFORD, BROWN & CATHERWOOD, INC.	10306	

Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.

Employment Dates	Employer Name	Employer Location
01/1992 - Present	BELOYAN INVESTMENT SECURITIES, INC.	DAVIE, FL

Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious or fraternal and is recognized as tax exempt.

FREELANCE BOAT CAPTAIN, AND CAPTAIN OF OFF THE CHART FISHING CHARTERS, PRIMARILY ON WEEKENDS. STARTED JANUARY 2008 AND IS NOT INVESTMENT RELATED. THIS BUSINESS WILL BE RUN OUT OF MY HOME.I WILL SPEND APPROXIMATELY 10 HOURS PER MONTH IN THE VENTURE OR WHAT IS REQUIRED. NUMBER OF HOURS DEVOTED DURING TRADING HOURS IS 1 HOUR PER MONTH. J3 ADVANCED ENGINEERING-MEMBER OF BOARD OF DIRECTORS-2 HOURS A WEEK, MOSTLY OUTSIDE MARKET HOURS.REMEDIATION OF SOIL AND CONTAMINANTS AND CONSTRUCTION, NON SECURITIES RELATED. CEO OF BAHAMAS CERTIFIED SEAFOOD, INC.-FISHING COMPANY LOCATED IN DAVIE, FLORIDA- APPROX. 10 HOURS WEEK, NOT DURING MARKET HOURS.NOT SECURITIES RELATED.

Registration and Employment History



Other Business Activities, continued



Disclosure Events

What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
 - A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage firms and regulators. When more than one of these sources reports information for the same disclosure event, all 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:**
 - 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.
 - 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 brokers and brokerage 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.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

	Pending	Final	On Appeal
Regulatory Event	0	2	0



Financial	0	2	N/A
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Disclosure Event Details

When evaluating this information, please keep in mind that a disclosure event may be pending or involve allegations that are contested and have not been resolved or proven. The matter may, in the end, be withdrawn, dismissed, resolved in favor of the broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD and therefore some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

Regulatory - Final

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

Disclosure 1 of 2

Reporting Source:	Regulator
Regulatory Action Initiated By:	FINRA
Sanction(s) Sought:	Other: N/A
Date Initiated:	12/01/2010
Docket/Case Number:	2009017590801
Employing firm when activity occurred which led to the regulatory action:	TRADESPOT MARKETS INC.
Product Type:	Other: UNREGISTERED SHARES, LOW PRICE STOCK
Allegations:	SECTION 5 OF THE SECURITIES ACT OF 1933, FINRA RULE 2010, NASD RULES 2110, 3010(A) AND (B), 3011(A): FROM APPROXIMATELY MAY 14, 2008, THROUGH DECEMBER 14, 2008, A MEMBER FIRM, THROUGH BELOYAN, SOLD 1,137,336,333 SHARES OF A COMPANY STOCK FOR ONE OF ITS CUSTOMERS. THE SHARES SOLD WERE NOT REGISTERED WITH THE SEC, AND NO EXEMPTION FROM REGISTRATION APPLIED TO THEM, THEREBY THE FIRM, THROUGH BELOYAN, PARTICIPATED IN THE ILLICIT DISTRIBUTION OF MORE THAN 1 BILLION SHARES OF UNREGISTERED AND NON-EXEMPT COMPANY STOCK. THE CUSTOMER OPENED TWO ACCOUNTS AT THE FIRM WITH BELOYAN; OPENING ONE OF THE



ACCOUNTS FOR HIM, THE CUSTOMER, AND THE OTHER FOR A COMPANY OF WHICH HE WAS THE SOLE OFFICER AND DIRECTOR. BETWEEN APRIL 2008 AND FEBRUARY 2009, THE CUSTOMERS DEPOSITED NEARLY FIVE BILLION SHARES OF LOW PRICE STOCK IN CERTIFICATE FORM, INTO THEIR RESPECTIVE ACCOUNTS. THEY THEN LIQUIDATED ALL OF THOSE SHARES, TYPICALLY SOON AFTER DEPOSITING THEM, AND WIRED THE PROCEEDS OUT OF THE ACCOUNT, TYPICALLY SOON AFTER THE LIQUIDATIONS. THE LIQUIDATIONS OF THE SHARES OF THOSE STOCKS GENERATED GROSS SALES PROCEEDS OF APPROXIMATELY \$663,000 AND GROSS COMMISSIONS PAID TO THE FIRM OF APPROXIMATELY \$25,000. PRIOR TO OPENING THE ACCOUNTS, THE CUSTOMER HAD BEEN THE SUBJECT OF DISCIPLINARY ACTIONS BY BOTH NASD AND THE SEC. PRIOR TO OPENING THE ACCOUNTS, BELOYAN WAS AWARE THAT THE CUSTOMER HAD SETTLED A MATTER WITH THE SEC, BUT WAS UNAWARE OF ANY NASD MATTER INVOLVING THE CUSTOMER. DESPITE SUSPICIOUS NATURE OF THE CUSTOMER'S ACTIVITY IN THE SHARES OF THE COMPANY'S LOW PRICED STOCK, SUSPICIOUS NATURE OF THE ACTIVITY IN THE CUSTOMER'S NON-QUALIFIED ACCOUNT, AND THE CUSTOMER'S REGULATORY AND CRIMINAL HISTORY, THE FIRM, THROUGH BELOYAN, FAILED TO CONDUCT THE NECESSARY DUE DILIGENCE TO DETERMINE WHETHER THEY WERE PARTICIPATING IN A SCHEME TO EVADE THE REGISTRATION REQUIREMENTS OF SECTION 5 BY SELLING THE CUSTOMER'S SHARES OF A COMPANY'S LOW PRICE STOCK. THE FIRM, THROUGH BELOYAN AS ITS PRESIDENT AND CHIEF COMPLIANCE OFFICER, FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING ADEQUATE WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ENSURE COMPLIANCE WITH APPLICABLE SECURITIES LAWS AND REGULATIONS, AND WITH APPLICABLE NASD RULES REGARDING THE DISTRIBUTION AND PREVENTION OF THE SALE OF UNREGISTERED AND NON-EXEMPT SECURITIES. BELOYAN, AS THE FIRM'S PRESIDENT AND CCO, HAD SOLE RESPONSIBILITY FOR THE ADEQUACY OF THE FIRM'S SUPERVISORY PROCEDURES, AS WELL AS THE CONTENT OF ITS WRITTEN SUPERVISORY PROCEDURES. THE FIRM, THROUGH BELOYAN, FAILED TO IMPLEMENT OR ENFORCE THE FIRM'S ANTI-MONEY LAUNDERING (AML) PROGRAM BY FAILING TO IDENTIFY SUSPICIOUS ACTIVITY, PROPERLY INVESTIGATE IT, AND FILE A FORM SAR-SF ON SUCH ACTIVITY, AS APPROPRIATE.

Current Status:

Final

Resolution:

Decision & Order of Offer of Settlement



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

No

Resolution Date:

08/04/2011

Sanctions Ordered:

Suspension

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?

No

(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?



(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or

(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 2

Sanction Type:	Suspension
Capacities Affected:	ANY PRINCIPAL CAPACITY
Duration:	TWO MONTHS
Start Date:	09/06/2011
End Date:	11/05/2011

Sanction 2 of 2



Sanction Type: Suspension
Capacities Affected: ANY CAPACITY
Duration: ONE MONTH
Start Date: 09/06/2011
End Date: 10/05/2011

Regulator Statement WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, BELOYAN CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE, HE IS SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR ONE MONTH AND SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN A PRINCIPAL CAPACITY FOR AN ADDITIONAL MONTH. IN LIGHT OF BELOYAN'S FINANCIAL STATUS, NO MONETARY SANCTIONS WERE IMPOSED. THE SUSPENSION IN ANY CAPACITY IS IN EFFECT FROM SEPTEMBER 6, 2011 THROUGH OCTOBER 5, 2011. THE SUSPENSION IN A PRINCIPAL CAPACITY IS IN EFFECT FROM SEPTEMBER 6, 2011 THROUGH NOVEMBER 5, 2011.

Reporting Source: Broker
Regulatory Action Initiated By: FINRA
Sanction(s) Sought: Other: N/A
Date Initiated: 12/01/2010
Docket/Case Number: [2009017590801](#)
Employing firm when activity occurred which led to the regulatory action: TRADESPOT MARKETS INC.

Product Type: Other: UNREGISTERED SHARES AND LOW PRICED STOCK

Allegations: SEC SECTION 5 OF THE SECURITIES ACT OF 1933, FINRA RULE 2010, NASD RULES 2110, 3010(A) AND (B), 3011(A): FROM APPROXIMATELY MAY 14, 2008, THROUGH DECEMBER 14, 2008, A MEMBER FIRM, THROUGH BELOYAN, SOLD 1,137,336,333 SHARES OF A COMPANY STOCK FOR ONE OF ITS CUSTOMERS. THE SHARES SOLD WERE NOT REGISTERED WITH THE SEC, AND NO EXEMPTION FROM REGISTRATION APPLIED TO THEM, THEREBY THE FIRM, THROUGH BELOYAN, PARTICIPATED IN THE ILLICIT DISTRIBUTION OF MORE THAN 1 BILLION SHARES OF UNREGISTERED AND NON-EXEMPT COMPANY STOCK. THE CUSTOMER OPENED TWO



ACCOUNTS AT THE FIRM WITH BELOYAN; OPENING ONE OF THE ACCOUNTS FOR HIM, THE CUSTOMER, AND THE OTHER FOR A COMPANY OF WHICH HE WAS THE SOLE OFFICER AND DIRECTOR. BETWEEN APRIL 2008 AND FEBRUARY 2009, THE CUSTOMERS DEPOSITED NEARLY FIVE BILLION SHARES OF LOW PRICE STOCK OF FOUR ISSUERS, IN CERTIFICATE FORM, INTO THEIR RESPECTIVE ACCOUNTS. THEY THEN LIQUIDATED ALL OF THOSE SHARES, TYPICALLY SOON AFTER DEPOSITING THEM, AND WIRED THE PROCEEDS OUT OF THE ACCOUNT, TYPICALLY SOON AFTER THE LIQUIDATIONS. THE LIQUIDATIONS OF THE SHARES OF THOSE FOUR STOCKS GENERATED GROSS SALES PROCEEDS OF APPROXIMATELY \$663,000 AND GROSS COMMISSIONS PAID TO FIRM OF APPROXIMATELY \$25,000. PRIOR TO OPENING THE ACCOUNTS, THE CUSTOMER HAD BEEN THE SUBJECT OF DISCIPLINARY ACTIONS BY BOTH THE NASD AND SEC. PRIOR TO OPENING THE ACCOUNTS, BELOYAN WAS AWARE THAT THE CUSTOMER HAD SETTLED A MATTER WITH THE SEC, BUT WAS UNAWARE OF ANY NASD MATTER INVOLVING THE CUSTOMER. DESPITE SUSPICIOUS NATURE OF THE CUSTOMER'S ACTIVITY IN THE SHARES OF THE COMPANY'S LOW PRICED STOCK, SUSPICIOUS NATURE OF THE ACTIVITY IN THE CUSTOMER'S NON-QUALIFIED ACCOUNT, AND THE CUSTOMER'S REGULATORY AND CRIMINAL HISTORY, THE FIRM THROUGH BELOYAN, FAILED TO CONDUCT THE NECESSARY DUE DILIGENCE TO DETERMINE WHETHER THEY WERE PARTICIPATING IN A SCHEME TO EVADE THE REGISTRATION REQUIREMENTS OF SECTION 5 BY SELLING THE CUSTOMER'S SHARES OF A COMPANY'S LOW PRICE STOCK. THE FIRM, THROUGH BELOYAN AS ITS PRESIDENT AND CCO, FAILED TO ESTABLISH AND MAINTAIN A SUPERVISORY SYSTEM, INCLUDING ADEQUATE WRITTEN SUPERVISORY PROCEDURES, REASONABLY DESIGNED TO ENSURE COMPLIANCE WITH APPLICABLE SECURITIES LAWS AND REGULATIONS, AND WITH APPLICABLE NASD RULES REGARDING THE DISTRIBUTION AND PREVENTION OF THE SALE OF UNREGISTERED AND NON-EXEMPT SECURITIES. BELOYAN, AS THE FIRM'S PRESIDENT AND CCO, HAD SOLE RESPONSIBILITY FOR THE ADEQUACY OF THE FIRM'S SUPERVISORY PROCEDURES, AS WELL AS THE CONTENT OF ITS WRITTEN SUPERVISORY PROCEDURES. THE FIRM, THROUGH BELOYAN, AS ITS AMLCO, FAILED TO IMPLEMENT OR ENFORCE THE FIRM'S AML PROGRAM BY FAILING TO IDENTIFY SUSPICIOUS ACTIVITY, PROPERLY INVESTIGATE IT, AND FILE A FORM SAR-SF ON SUCH ACTIVITY, AS APPROPRIATE.

Current Status: Final

Resolution: Decision & Order of Offer of Settlement



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

Resolution Date: 08/04/2011

Sanctions Ordered: Suspension

Sanction 1 of 2

Sanction Type: Suspension

Capacities Affected: GENERAL SECURITIES PRINCIPAL

Duration: 2 MONTHS

Start Date: 09/06/2011

End Date: 11/05/2011

Sanction 2 of 2

Sanction Type: Suspension

Capacities Affected: ALL CAPACITIES

Duration: 1 MONTH

Start Date: 09/06/2011

End Date: 10/05/2011

Disclosure 2 of 2

Reporting Source: Regulator

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Other: N/A

Date Initiated: 02/02/2009

Docket/Case Number: [2005001988201](#)

Employing firm when activity occurred which led to the regulatory action: TRADESPOT MARKETS INC. F/K/A BELOYAN INVESTMENT SECURITIES, INC.



Product Type:	Equity-OTC
Allegations:	NASD RULES 2110, 2210(D) AND 2315(A): RESPONDENT, ACTING ON BEHALF OF A MEMBER FIRM, DRAFTED AND DISTRIBUTED EMAIL CORRESPONDENCE IN WHICH HE RECOMMENDED THE PURCHASE OF A STOCK ISSUED BY A COMPANY TO EXISTING AND PROSPECTIVE CUSTOMERS. IN THE EMAILS, RESPONDENT FAILED TO: PROVIDE A SOUND BASIS FOR HIS RECOMMENDATION OF THE STOCK; PROVIDE A FAIR AND BALANCED PRESENTATION OF THE RISKS ASSOCIATED WITH INVESTING IN THE STOCK; AND DISCLOSE MATERIAL NEGATIVE FACTS REGARDING THE STOCK, SUCH AS A SEC CIVIL ACTION ALLEGING SECURITIES FRAUD VIOLATIONS AGAINST THE COMPANY AND ITS OFFICERS AND A NOTICE TO THE SEC THAT THE COMPANY WAS DEREGISTERING ITS SECURITIES. IN AN EMAIL, RESPONDENT MADE A FALSE AND MISLEADING CLAIM THAT HE WAS BUYING THE STOCK WHEN, IN FACT, HE HAD NOT BOUGHT THE STOCK IN MONTHS AND HAD ACTUALLY BEEN SELLING THE STOCK, AND FAILED TO DISCLOSE THAT HE WAS SELLING THE STOCK. IN ANOTHER EMAIL, RESPONDENT ALSO RECOMMENDED THAT CUSTOMERS PURCHASE STOCK ISSUED BY ANOTHER COMPANY AND FAILED TO: PROVIDE A SOUND BASIS FOR HIS RECOMMENDATION OF THE STOCK; PROVIDE A FAIR AND BALANCED PRESENTATION OF THE RISKS ASSOCIATED WITH INVESTING IN THE STOCK; AND DISCLOSE MATERIAL NEGATIVE FACTS REGARDING THE STOCK, SUCH AS A COMPANY STATEMENT THAT CAST SUBSTANTIAL DOUBT ABOUT THE COMPANY'S ABILITY TO CONTINUE AS A GOING CONCERN. ACTING ON BEHALF OF HIS FIRM, RESPONDENT ALSO RECOMMENDED THE PURCHASE OF THE COMPANY STOCK WITHOUT ANYONE REVIEWING THE COMPANY'S CURRENT FINANCIAL STATEMENTS.
Current Status:	Final
Action Appealed To:	SRO
Date Appeal filed:	08/31/2010
Appeal Limitation Details:	
Resolution:	Decision
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Resolution Date:	01/22/2012



Sanctions Ordered:

Civil and Administrative Penalty(ies)/Fine(s)
Monetary Penalty other than Fines
Suspension

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?

No

(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?

(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or



(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Sanction 1 of 1

Sanction Type: Suspension
Capacities Affected: ANY CAPACITY
Duration: 10 BUSINESS DAYS
Start Date: 02/27/2012
End Date: 03/09/2012

Monetary Sanction 1 of 3

Monetary Related Sanction: Monetary Penalty other than Fines
Total Amount: \$3,868.00
Portion Levied against individual: \$3,868.00
Payment Plan:
Is Payment Plan Current: Yes
Date Paid by individual: 04/27/2012
Was any portion of penalty waived? No

Amount Waived:

Monetary Sanction 2 of 3



Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$13,500.00

Portion Levied against individual: \$13,500.00

Payment Plan:

Is Payment Plan Current: Yes

Date Paid by individual: 04/27/2012

Was any portion of penalty waived? No

Amount Waived:

Monetary Sanction 3 of 3

Monetary Related Sanction: Monetary Penalty other than Fines

Total Amount: \$1,608.50

Portion Levied against individual: \$1,608.50

Payment Plan:

Is Payment Plan Current: Yes

Date Paid by individual: 04/27/2012

Was any portion of penalty waived? No

Amount Waived:

Regulator Statement

AMENDED HEARING PANEL DECISION RENDERED AUGUST 6, 2010 WHEREIN BELOYAN IS FINED, JOINTLY AND SEVERALLY, A TOTAL OF \$13,500, SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ANY CAPACITY FOR TEN BUSINESS DAYS, AND ORDER TO PAY COSTS IN THE AMOUNT OF \$3,868 FOR RECOMMENDING THE PURCHASE OF SECURITIES IN E-MAILS THAT WERE UNBALANCED, MISLEADING, AND OMITTED MATERIAL FACTS, AND FOR RECOMMENDING TO CUSTOMERS AN OTC EQUITY WITHOUT REVIEWING CURRENT FINANCIAL STATEMENTS FOR THE ISSUER. APPEALED TO THE NAC ON AUGUST 31, 2010. NAC DECISION RENDERED DECEMBER 20, 2011 WHEREIN THE FINDINGS MADE ARE HELD AND THE SANCTIONS IMPOSED BY THE HEARING PANEL ARE AFFIRMED, THEREFORE BELOYAN IS FINED \$13,500, JOINTLY AND SEVERALLY, SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER



IN ANY CAPACITY FOR 10 BUSINESS DAYS, ORDERED TO PAY HEARING PANEL COSTS IN THE AMOUNT OF \$3,868 AND IMPOSED APPEAL COSTS OF \$1,608.50. THE DECISION IS FINAL ON JANUARY 22, 2012 AND THE SUSPENSION IS IN EFFECT FEBRUARY 27, 2012, THROUGH MARCH 9, 2012. FINES PAID IN FULL APRIL 27, 2012.

Reporting Source: Broker

Regulatory Action Initiated By: FINRA

Sanction(s) Sought: Other: NA

Date Initiated: 02/02/2009

Docket/Case Number: [2005001988201](#)

Employing firm when activity occurred which led to the regulatory action: TRADESPOT MARKETS INC.

Product Type: Equity-OTC

Allegations: NASD RULES 2110, 2210(D) AND 2315(A): A REGISTERED REPRESENTATIVE, ON BEHALF OF THE FIRM, DRAFTED AND DISTRIBUTED EMAIL CORRESPONDENCE IN WHICH HE RECOMMENDED THE PURCHASE OF A STOCK ISSUED BY A COMPANY TO EXISTING AND PROSPECTIVE CUSTOMERS. IN THE EMAILS, THE REPRESENTATIVE FAILED TO: PROVIDE A SOUND BASIS FOR ITS RECOMMENDATION OF THE STOCK; PROVIDE A FAIR AND BALANCED PRESENTATION OF THE RISKS ASSOCIATED WITH INVESTING IN THE STOCK; AND DISCLOSE MATERIAL NEGATIVE FACTS REGARDING THE STOCK, SUCH AS A SEC CIVIL ACTION ALLEGING SECURITIES FRAUD VIOLATIONS AGAINST THE COMPANY AND ITS OFFICERS AND A NOTICE TO THE SEC THAT THE COMPANY WAS DEREGISTERING ITS SECURITIES. IN ANOTHER EMAIL, THE REPRESENTATIVE, ON BEHALF OF THE FIRM, ALSO RECOMMENDED THAT CUSTOMERS PURCHASE THE STOCK OF ANOTHER COMPANY AND FAILED TO: PROVIDE A SOUND BASIS FOR ITS RECOMMENDATION OF THE STOCK; PROVIDE A FAIR AND BALANCED PRESENTATION OF THE RISKS ASSOCIATED WITH INVESTING IN THE STOCK; AND DISCLOSE MATERIAL NEGATIVE FACTS REGARDING THE STOCK, SUCH AS A COMPANY STATEMENT THAT CAST SUBSTANTIAL DOUBT ABOUT THE COMPANY'S ABILITY TO CONTINUE AS A GOING CONCERN. THE REPRESENTATIVE, ON BEHALF OF THE FIRM, ALSO RECOMMENDED THE PURCHASE OF THE STOCK WITHOUT ANYONE REVIEWING THE COMPANY'S CURRENT FINANCIAL STATEMENTS.



Current Status: Final
Action Appealed To: NATIONAL ADJUDICATORY COUNCIL
Date Appeal filed: 08/31/2010
Appeal Limitation Details:
Resolution: Decision
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No
Resolution Date: 01/22/2012
Sanctions Ordered: Civil and Administrative Penalty(ies)/Fine(s)
 Suspension
Sanction 1 of 1
Sanction Type: Suspension
Capacities Affected: ALL CAPACITIES
Duration: 10 BUSINESS DAYS
Start Date: 02/27/2012
End Date: 03/09/2012
Monetary Sanction 1 of 2
Monetary Related Sanction: Monetary Penalty other than Fines
Total Amount: \$5,477.05
Portion Levied against individual: \$5,477.05
Payment Plan: FINE PAID IN FULL
Is Payment Plan Current: Yes
Date Paid by individual: 06/25/2012
Was any portion of penalty waived? No
Amount Waived:

**Monetary Sanction 2 of 2****Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)**Total Amount:** \$13,500.00**Portion Levied against individual:** \$13,500.00**Payment Plan:** FINE PAID IN FULL**Is Payment Plan Current:** Yes**Date Paid by individual:** 06/25/2012**Was any portion of penalty waived?** No**Amount Waived:****Broker Statement****AMENDED STATEMENT**

I CONTINUE TO BELIEVE THAT THE ALLEGATIONS MADE AGAINST ME AND MY FIRM ARE BASELESS. I BELIEVE THAT I PROVIDED ALL THE NECESSARY DISCLOSURES. MULTIPLE WITNESSES AT THE HEARING TESTIFIED THAT I HAD GIVEN THEM MANY AND REPEATED ADEQUATE DISCLOSURES AND THAT I TOLD THEM ON MANY OCCASIONS BOTH ORALLY AND IN WRITING THE ISSUER'S SEC HISTORY. AS THE INVESTORS I HAVE BEEN PRIVILEGED TO SERVE OVER MY 26+ YEAR CAREER IN THE SECURITIES INDUSTRY KNOW, I HAVE ALWAYS BEEN WHOLLY COMMITTED TO SERVING THEIR BEST INTERESTS WITH COMPLETE HONESTY AND INTEGRITY. I WILL CONTINUE TO DO SO."



Financial - Final

This type of disclosure event involves a bankruptcy, compromise with one or more creditors, or Securities Investor Protection Corporation liquidation involving the broker or an organization/brokerage firm the broker controlled that occurred within the last 10 years.

Disclosure 1 of 2

Reporting Source:	Broker
Action Type:	Compromise
Action Date:	03/01/2013
Organization Investment-Related?	No
Type of Court:	State Court
Name of Court:	CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT IN BROWARD COUNTY FLORIDA
Location of Court:	FORT LAUDERDALE BROWARD COUNTY FL
Docket/Case #:	CACE-2010-028538
Action Pending?	No
Disposition:	Dismissed
Disposition Date:	03/01/2013
If a compromise with creditor, provide:	
Name of Creditor:	FIA CARD SERVICES
Original Amount Owed:	\$62,886.00
Terms Reached with Creditor:	I DISPUTED THE AMOUNT FIA CLAIMED I OWED. I AGREED TO PAY FIA WHAT I BELIEVED THAT I OWED WHICH WAS \$7000.00
Broker Statement	I DISPUTED THE AMOUNT FIA CLAIMED I OWED. I AGREED TO PAY FIA WHAT I BELIEVED THAT I OWED WHICH WAS \$7000.00, WHICH I DID

Disclosure 2 of 2

Reporting Source:	Broker
Action Type:	Compromise
Action Date:	08/14/2012



Organization Investment-Related? No

Action Pending? No

Disposition: Satisfied/Released

Disposition Date: 08/14/2012

If a compromise with creditor, provide:

Name of Creditor: BRC AND SAC

Original Amount Owed: \$127,000.00

Terms Reached with Creditor: BOTH ENTITIES AGREED TO ACCEPT \$50,000.00 AS TOTAL PAYMENT TO SATISFY A LINE OF CREDIT.

Amount Paid:

SIPA (Securities Investor Protection Act)Trustee:

Currently Open?

Date Direct Payment Initiated/Filed or Trustee Appointed: 08/14/2012

End of Report



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