

**FINANCIAL INDUSTRY REGULATORY AUTHORITY  
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT  
NO. 2022076239801**

TO: Department of Enforcement  
Financial Industry Regulatory Authority (FINRA)

RE: Avenue Securities LLC (Respondent)  
Member Firm  
CRD No. 292589

Pursuant to FINRA Rule 9216, Respondent Avenue Securities LLC submits this Letter of Acceptance, Waiver, and Consent (AWC) for the purpose of proposing a settlement of the alleged rule violations described below. This AWC is submitted on the condition that, if accepted, FINRA will not bring any future actions against Respondent alleging violations based on the same factual findings described in this AWC.

**I.**

**ACCEPTANCE AND CONSENT**

A. Respondent accepts and consents to the following findings by FINRA without admitting or denying them:

**BACKGROUND**

Avenue Securities LLC, which became a FINRA member in November 2018, provides self-directed trading through its online portal, primarily to retail customers who are Brazilian residents looking to invest in U.S. securities. The firm, which does not permit U.S. residents to open new accounts, is headquartered in Miami, Florida, and has approximately 40 registered representatives and one branch office.<sup>1</sup>

**OVERVIEW**

Between April 2022 and October 2024, Avenue Securities LLC provided customers approximately 21,000 confirmations for fixed-income transactions with inaccurate mark-up/mark-down information. As a result, Avenue violated Section 17(a) of the Securities Exchange Act of 1934, Exchange Act Rule 17a-3(a)(8), and FINRA Rules 2232, 4511, and 2010.

From April 2022 to July 2025, Avenue also failed to establish and maintain a supervisory system, including written procedures, reasonably designed to achieve compliance with confirmation requirements. In particular, between June 2023 and October 2024, the firm failed to reasonably investigate and respond to red flags that its customer confirmations

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<sup>1</sup> For more information about the firm, including prior regulatory events, visit BrokerCheck® at [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

included inaccurate information. As a result, Avenue violated FINRA Rules 3110 and 2010.

For these violations, Avenue is censured and fined \$100,000.

### **FACTS AND VIOLATIVE CONDUCT**

This matter originated from a review by FINRA's Department of Market Regulation and Transparency Services.

#### **Avenue issued customer confirmations that included inaccurate information and omitted required disclosures.**

Trade confirmations protect investors who buy or sell securities through broker-dealers by, among other things, alerting them to potential conflicts of interest with their broker-dealers and providing them the means to verify the terms of their transactions and evaluate transaction costs and the quality of their broker-dealers' executions.

FINRA Rule 2232(c) requires, with certain exceptions, that confirmations for principal-capacity transactions sent to non-institutional customers "include the member's mark-up or mark-down for the transaction, to be calculated in compliance with Rule 2121, expressed as a total dollar amount and as a percentage of the prevailing market price." FINRA Rule 2121 Supplementary Material .02(b) provides that the mark-up or mark-down for debt securities transactions must be calculated in relation to the prevailing market price for a debt security, which presumptively is determined by the dealer's contemporaneous cost to acquire, or its proceeds from reselling, the securities.

Section 17(a) of the Securities Exchange Act of 1934 and Exchange Act Rule 17a-3(a)(8) require broker-dealers to make and keep current copies of confirmations of all purchases and sales of securities.

FINRA Rule 4511 requires members to make and preserve records as required under the Exchange Act, Exchange Act rules, and FINRA rules. Confirmation records must be accurate to comply with these requirements.

A violation of the Exchange Act, an Exchange Act rule, or any FINRA rule also is a violation of FINRA Rule 2010, which requires members, in the conduct of their business, to observe high standards of commercial honor and just and equitable principles of trade.

From April 2022 to October 2024, Avenue sent approximately 21,000 customer confirmations for debt-securities transactions with inaccurate mark-up/mark-down information to retail customers. This included approximately 1,400 confirmations where the percentage of the mark-up/mark-down was inaccurately calculated by comparing the mark-up/mark-down amount to the security's par (face) value instead of the actual transaction price; 19,500 confirmations where, due to issues with the firm's order management system, both the amount and percentage were not calculated using the firm's contemporaneous cost even though the firm engaged in a contemporaneous

transaction on the other side of the customer order; and 12 confirmations that did not include information in the mark-up/mark-down fields when no mark-up/mark-down was charged. In total, these issues affected approximately 44 percent of the firm's fixed-income customer confirmations across this same period.

Therefore, Avenue violated Exchange Act § 17(a), Exchange Act Rule 17a-3(a)(8), and FINRA Rules 2232, 4511, and 2010.

**Avenue failed to establish and maintain a supervisory system reasonably designed to achieve compliance with customer confirmation requirements.**

FINRA Rule 3110(a) requires a member firm to establish and maintain a system to supervise the activities of each associated person that is reasonably designed to achieve compliance with applicable securities laws and regulations, and with applicable FINRA rules. FINRA Rule 3110(b) requires a member firm to establish, maintain, and enforce written procedures to supervise the types of business in which it engages and the activities of its associated persons that are reasonably designed to achieve compliance with the applicable securities laws and regulations, and with applicable FINRA rules. The duty to supervise under Rule 3110 also includes the responsibility to reasonably investigate red flags that suggest that misconduct may be occurring and to act upon the results of such investigation. A violation of FINRA Rule 3110 also constitutes a violation of FINRA Rule 2010.

From April 2022 to July 2025, Avenue failed to establish and maintain a supervisory system, including written supervisory procedures (WSPs), that was reasonably designed to achieve compliance with applicable customer confirmation rules. To ensure accurate customer confirmations, the firm relied on a monthly review of a sample of customer confirmations. Prior to March 2024, the firm's WSPs did not specifically require that fixed-income confirmations be included in the review sample, and in practice the firm rarely included them. In March 2024, following inquiries by FINRA staff, the firm revised its procedures. But the limited sample review in those revised procedures was not reasonably designed to identify inaccurate fixed-income confirmations. In July 2025, Avenue remediated these issues by further revising its supervisory procedures.

Between June 2023 and October 2024, the firm also failed to reasonably investigate after receiving calls from customers questioning the accuracy of the mark-up/mark-down amounts listed on their confirmations for debt securities. Despite these calls, Avenue made no changes to how its order management system calculated and reported mark-up/mark-down amounts on customer confirmations until October 2024, when it corrected the reporting errors.

Therefore, Avenue violated FINRA Rules 3110 and 2010.

B. Respondent also consents to the imposition of the following sanctions:

- a censure and
- a \$100,000 fine.

Respondent agrees to pay the monetary sanction upon notice that this AWC has been accepted and that such payment is due and payable. Respondent has submitted an Election of Payment form showing the method by which it proposes to pay the fine imposed.

Respondent specifically and voluntarily waives any right to claim an inability to pay, now or at any time after the execution of this AWC, the monetary sanction imposed in this matter.

The sanctions imposed in this AWC shall be effective on a date set by FINRA.

## II.

### **WAIVER OF PROCEDURAL RIGHTS**

Respondent specifically and voluntarily waives the following rights granted under FINRA's Code of Procedure:

- A. To have a complaint issued specifying the allegations against it;
- B. To be notified of the complaint and have the opportunity to answer the allegations in writing;
- C. To defend against the allegations in a disciplinary hearing before a hearing panel, to have a written record of the hearing made, and to have a written decision issued; and
- D. To appeal any such decision to the National Adjudicatory Council (NAC) and then to the U.S. Securities and Exchange Commission and a U.S. Court of Appeals.

Further, Respondent specifically and voluntarily waives any right to claim bias or prejudgment of the Chief Legal Officer, the NAC, or any member of the NAC, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

Respondent further specifically and voluntarily waives any right to claim that a person violated the ex parte prohibitions of FINRA Rule 9143 or the separation of functions prohibitions of FINRA Rule 9144, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

### III.

#### OTHER MATTERS

Respondent understands that:

- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs (ODA), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against Respondent; and
- C. If accepted:
  - 1. this AWC will become part of Respondent's permanent disciplinary record and may be considered in any future action brought by FINRA or any other regulator against Respondent;
  - 2. this AWC will be made available through FINRA's public disclosure program in accordance with FINRA Rule 8313;
  - 3. FINRA may make a public announcement concerning this agreement and its subject matter in accordance with FINRA Rule 8313; and
  - 4. Respondent may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any finding in this AWC or create the impression that the AWC is without factual basis. Respondent may not take any position in any proceeding brought by or on behalf of FINRA, or to which FINRA is a party, that is inconsistent with any part of this AWC. Nothing in this provision affects Respondent's right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party. Nothing in this provision affects Respondent's testimonial obligations in any litigation or other legal proceedings.
- D. Respondent may attach a corrective action statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. Respondent understands that it may not deny the charges or make any statement that is inconsistent with the AWC in this statement. This statement does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA.

The undersigned, on behalf of Respondent, certifies that a person duly authorized to act on Respondent's behalf has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that Respondent has agreed to the AWC's

provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth in this AWC and the prospect of avoiding the issuance of a complaint, has been made to induce Respondent to submit this AWC.

October 16, 2025

\_\_\_\_\_  
Date

*Roberto Llopis Lee*

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Avenue Securities LLC  
Respondent

Print Name: Roberto Llopis Lee

Title: ceo

Reviewed by:

*Lara Thyagarajan*

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Lara C. Thyagarajan, Esq.  
Counsel for Respondent  
Sidley Austin LLP  
787 Seventh Avenue  
New York, NY 10019

Accepted by FINRA:

Signed on behalf of the  
Director of ODA, by delegated authority

October 27, 2025

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Date

*Jonathan J. Ossip*

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Jonathan J. Ossip  
Principal Counsel  
FINRA  
Department of Enforcement  
1700 K Street NW  
Washington, DC 20006