

**NASD
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 20050021859**

**TO: Department of Enforcement
NASD**

**RE: Hunter Scott Financial, L.L.C., Respondent
Broker-Dealer
[CRD No. 45559]**

**Peter Alex Gouzos, Respondent
General Securities Principal
[CRD No. 195966]**

Pursuant to Rule 9216 of the NASD Code of Procedure, Respondents submit this Letter of Acceptance, Waiver and Consent ("AWC") for the purpose of proposing a settlement of the alleged rule violations described in Part II below. This AWC is submitted on the condition that, if accepted, NASD will not bring any future actions against us alleging violations based on the same factual findings.

We understand that:

1. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by NASD's Department of Enforcement and National Adjudicatory Council ("NAC") Review Subcommittee or Office of Disciplinary Affairs ("ODA"), pursuant to NASD Rule 9216;
2. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against us; and
3. If accepted:
 - a. this AWC will become part of our permanent disciplinary record and may be considered in any future actions brought by the NASD or any other regulator against us;
 - b. this AWC will be made available through NASD's public disclosure program in response to public inquiries about our disciplinary record;
 - c. NASD may make a public announcement concerning this agreement and the subject matter thereof in accordance with NASD Rule 8310 and IM-8310-2; and

- d. We 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. Nothing in this provision affects our testimonial obligations or right to take legal or factual positions in litigation or other legal proceedings in which the NASD is not a party.

We also understand that our experience in the securities industry and disciplinary history may be factors that will be considered in deciding whether to accept this AWC. That experience and history are as follows:

Hunter Scott Financial, L.L.C. is a Florida limited liability company located in Delray Beach, Florida, and has been a member of NASD since March 2003. At all times relevant hereto, the firm was a member of NASD and registered as a broker/dealer with the United States Securities and Exchange Commission, with approximately 50 registered representatives in five branch offices. At present, the firm employs approximately 21 registered representatives in three branch offices. During 2003-2004, the firm operated pursuant to SEC Rule 15c3-1(a)(2)(vi) as a \$5,000 broker/dealer, and in 2005 the firm became a \$100,000 broker/dealer pursuant to SEC Rule 15c3-1(a)(2)(iii). The firm has no relevant disciplinary history.

Peter Alex Gouzos entered the securities industry in June 1989 as a general securities representative with The Prudential Insurance Company of America, where he was employed through April 1990. Thereafter, Respondent Gouzos was employed in the securities industry as follows:

Pruco Securities Corporation	06/90-07/90
Global Capital Securities, Inc.	07/90-01/91
Berkeley Securities Corporation	02/91-03/91
Shearson	04/91-06/91
Lehman Brothers, Inc.	06/91-06/91
Manchester Rhone Securities Corp.	07/91-10/91
Thomas James Associates, Inc.	11/91-07/92
Reich & Co., Inc.	08/92-01/93
The Wellington Group, Inc.	01/93-05/94
Corporate Securities Group, Inc.	05/94-09/96
Argent Securities, Inc.	09/96-08/97
J.P. Turner & Company, L.L.C.	08/97-04/99
Emerson Bennett & Associates	07/99-01/01
Dawson James Securities	12/02-01/03
Hunter Scott	01/03-Present

Respondent Gouzos is the owner of Hunter Scott and first became registered as a general securities principal on September 16, 1994. Respondent Gouzos is currently registered with NASD and has no disciplinary history.

I.

WAIVER OF PROCEDURAL RIGHTS

We specifically and voluntarily waive the following rights granted under the NASD's Code of Procedure:

- A. To have a Formal Complaint issued specifying the allegations against us;
- B. To be notified of the Formal 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 NAC and then to the U.S. Securities and Exchange Commission and a U.S. Court of Appeals.

Further, we specifically and voluntarily waive any right to claim bias or prejudgment of the General Counsel, 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 acceptance or rejection of this AWC.

We further specifically and voluntarily waive any right to claim that a person violated the ex parte prohibitions of Rule 9143 or the separation of functions prohibitions of 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.

II.

ACCEPTANCE AND CONSENT

- A. We hereby accept and consent, without admitting or denying the findings, and solely for the purposes of this proceeding and any other proceeding brought by or on behalf of NASD, or to which NASD is a party, prior to a

hearing and without an adjudication of any issue of law or fact, to the entry of the following findings by NASD:

During the period from January 2003 through December 2005 ("the relevant period"), Hunter Scott Financial, L.L.C. ("Respondent Hunter Scott" or "the firm"), acting through its chief executive officer, Peter Alex Gouzos ("Respondent Gouzos"), failed to adequately implement its anti-money laundering (AML) compliance program. For much of the relevant period, Respondent Gouzos was the firm's designated Director of Compliance and AML Officer. At various points during the relevant period, the firm's written supervisory procedures failed to accurately identify certain other individuals designated as the firm's AML Officer. At all times during the relevant period, the designated AML Officer reported directly to Respondent Gouzos.

Specifically, during the relevant period Respondent Gouzos and the firm failed to: properly monitor wire transfers by limiting its review to only certain transfers over \$100,000, thereby omitting from its review other wire transfer activity which might have contained certain "red flags" such as repeated incoming and outgoing wire transfers, and transfers with no apparent business purpose; implement the firm's customer identification program and, as a result, failed to obtain proper customer identification for at least 25 accounts opened during the relevant period; designate properly trained individuals (including Gouzos) as AML compliance officer; designate accurately in the firm's written supervisory procedures each AML officer designated during the relevant period; and provide proper AML training for either the firm's designated AML officers or the firm's employees.

Such acts, practices, and conduct constitute separate and distinct violations of NASD Conduct Rules 3011(a), (b), (d), and (e), and 2110 by Respondents Hunter Scott and Gouzos.

B. We also consent to the imposition, at a maximum, of the following sanctions:

A censure, and a monetary fine of \$15,000 against Respondent Hunter Scott, \$10,000 of which is joint and several with Respondent Gouzos.

A censure, and a monetary fine of \$10,000, to be imposed jointly and severally with Respondent Hunter Scott, against Respondent Gouzos.

An undertaking by Respondent Gouzos to register for, within 60 days of the date of issuance of this AWC, sixteen (16) hours of training concerning anti-money laundering, in a program not unacceptable to NASD. Respondent Gouzos shall provide NASD with evidence that he registered

for the program within ten (10) days of his registration. In addition, Respondent Gouzos shall attend and complete such training within six months of the issuance of this AWC, and shall provide NASD with evidence that he completed such training within ten (10) days of completion of the training program. For good cause shown, and upon receipt of a timely application from Respondent Gouzos, NASD may extend the time in which Respondent Gouzos may complete the foregoing requirements.

The sanctions imposed herein shall be effective on a date set by the NASD staff. Pursuant to IM-8310-2(f), a bar or expulsion shall become effective upon approval or acceptance of this AWC by the NAC.

III.

OTHER MATTERS

- A. We understand that we 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 NASD, nor does it reflect the views of NASD or its staff.
- B. We understand that if we are barred or suspended from association with any NASD member, we become subject to a statutory disqualification as that term is defined in Section 3(a)(39) of the Securities Exchange Act of 1934, as amended. Accordingly, we may not be associated with any NASD member in any capacity, including clerical or ministerial functions, during the period of the bar or suspension. (See NASD Rule 8310 and IM-8310-1).

We certify that we have read and understand all of the provisions of this AWC and have been given a full opportunity to ask questions about it, and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein, has been made to induce us to submit it.

6/13/06
Date


Hunter Scott Financial, L.L.C.

By: _____

JUN-13-2006 13:57 FROM:

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06-13-06 01:06pm From-ROBERT WAYNE PEARCE P.A.

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6/13/06
Date

Peter Alex Gouzes
Peter Alex Gouzes

Reviewed by:

Robert Wayne Pearce
Robert Wayne Pearce, Esq.
Counsel for Respondents

Accepted by NASD:

6/13/06
Date

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

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