

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2007007167101**

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REGISTRATION & DISCLOSURE

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

RE: SIG Securities, L.L.C. (A.K.A. -Summitalliance Securities, L.L.C.), Respondent
Broker Dealer
CRD No. 45915

Pursuant to NASD Rule 9216 of FINRA's Code of Procedure, SIG Securities, L.L.C. ("SIG" or "Respondent") 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 herein.

I.

ACCEPTANCE AND CONSENT

- A. Respondent hereby accepts and consents, without admitting or denying the findings, and solely for the purposes of this proceeding and any other proceeding brought by or on behalf of FINRA, or to which FINRA 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 FINRA:

BACKGROUND

SIG Securities, L.L.C. has been a member firm since December 4, 1998, and is registered as a broker-dealer with the Securities and Exchange Commission. SIG is a full-service broker-dealer, with its primary business in variable annuity and mutual fund products sold to retail customers. The firm currently employs forty-nine registered personnel and operates eleven branch offices.

RELEVANT PRIOR DISCIPLINARY HISTORY

SIG Securities, L.L.C. has no prior disciplinary history.

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OVERVIEW

From October 29, 2003 through April 8, 2007 SIG Securities, L.L.C. failed to report any transactions in TRACE-eligible securities to TRACE. Further, the firm did not establish written supervisory procedures for the trade reporting of TRACE-eligible securities.

FACTS AND VIOLATIVE CONDUCT

- A. 1. During the period from October 29, 2003, through April 8, 2007, the firm effected forty transactions in TRACE-eligible securities and failed to report any of those trades to TRACE.
2. During the relevant period, SIG failed to establish, maintain and enforce a system and procedures reasonably designed to achieve compliance with applicable federal securities laws and NASD Rules regarding trade reporting of TRACE-eligible securities.

Such acts, practice and course of conduct constitute separate and distinct violations of and NASD Marketplace Rules 6220(a) and 6230 and NASD Conduct Rule 3010(b)(1) by SIG Securities, L.L.C.

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

A censure and monetary fine in the amount of \$15,000.

The sanctions imposed herein shall be effective on a date set by FINRA staff.

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 Respondent proposes to pay the fine imposed.

Respondent specifically and voluntarily waives any right to claim that it is unable to pay, now or at any time hereafter, the monetary sanction imposed in this matter.

II.

WAIVER OF PROCEDURAL RIGHTS

Respondent specifically and voluntarily waives the following rights granted under FINRA's

Code of Procedure:

- A. To have a Formal Complaint issued specifying the allegations against it;
- 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 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 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.

Respondent further specifically and voluntarily waives any right to claim that a person violated the ex parte prohibitions of NASD Rule 9143 or the separation of functions prohibitions of NASD 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 NASD Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against it; and
- C. If accepted:

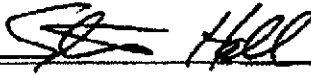
1. this AWC will become part of Respondent's permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against it;
 2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about Respondent's disciplinary record;
 3. FINRA may make a public announcement concerning this agreement and the subject matter thereof in accordance with NASD Rule 8310 and IM-8310-3; 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.
- 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 or its staff.

Respondent certifies that it has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; that it has agreed to its provisions voluntarily; and that no offer, threat, inducement, or promise of any kind, other than the terms set forth herein and the prospect of avoiding the issuance of a Complaint, has been made to induce Respondent to submit it.

Letter of Acceptance, Waiver and Consent
No. 2007007167101/SIG Securities, L.L.C.

SIG SECURITIES, L.L.C.

4-11-2008
Date

By: 
(Signature)

Name: STAN HALL
(Print Name)

Title: Chief Compliance Officer

Reviewed by:

Counsel for Respondent
SIG Securities, L.L.C.
Address:

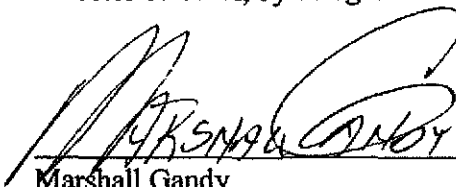
Phone:

Letter of Acceptance, Waiver and Consent
No. 2007007167101/SIG Securities, L.L.C.

Accepted by FINRA:

4/14/2008
Date

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

A handwritten signature in black ink, appearing to read "MARSHALL GANDY", written over a horizontal line.

Marshall Gandy
Senior Regional Counsel
FINRA Department of Enforcement
12801 North Central Expressway
Suite 1050
Dallas, TX 75243
Phone Number: 972-716-7692
Fax Number: 972-716-7612



Date: April 11, 2008

To: Marshall Gandy
Senior Regional Counsel, FINRA
Department of Enforcement
12801 North Central Expressway, Suite 1050
Dallas, TX 75243

Re: Statement of Corrective Action
SIG Securities, LLC (A.K.A. – SummitAlliance Securities, LLC)
(Exam or Investigation No. 20070071671)

This Corrective Action Statement is submitted by SIG Securities. It does not constitute factual or legal findings by FINRA, nor does it reflect the views of FINRA or its staff.

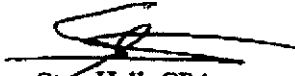
Dear Mr. Gandy:

The following steps have been taken by SIG Securities ("SIG" or the "firm") with respect to the reporting of TRACE eligible transactions:

1. SIG's clearing broker-dealer, National Financial Services ("NFS"), was and is contractually obligated to report the firm's TRACE-eligible transactions. It appears NFS failed to report such transactions from October 29, 2003 through April 8, 2007. Steps have been taken to ensure that NFS is now fulfilling its obligation to report these transactions on the firm's behalf.
2. The firm has established a system of procedures to ensure all eligible transactions are reported to TRACE. These procedures include the ability to access the TRACE system and compare reported transactions to the firm's transaction confirmations.

The firm was a TRACE participant during the relevant period and remains a participant.

Sincerely,



Stan Hall, CPA
Chief Compliance Officer
SummitAlliance Securities, LLC