

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2012034211303**

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

RE: Jinesh P. Brahmbhatt, Respondent
General Securities Representative
CRD No. 2491299

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, I submit 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 me alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. I 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 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

Jinesh P. Brahmbhatt ("Brahmbhatt" or "Respondent") was a General Securities Representative (Series 7) with Success Trade Securities, Inc. ("Success Trade" or "Firm") from April 4, 2009 until his resignation on April 8, 2013. Prior to his registration with Success Trade, Brahmbhatt was registered as a General Securities Representative with three other FINRA members: LPL Financial Corporation from May 22, 2008 to April 2, 2009; Merrill Lynch, Pierce, Fenner & Smith, Inc. from March 14, 1995 to May 22, 2008; and Stratton Oakmont from November 8, 1994 to January 11, 1995. Brahmbhatt also holds his Series 63 (Uniform Securities Agent State Law Exam) and Series 65 (Uniform Investment Adviser Law Exam) licenses. Brahmbhatt has not been registered with any FINRA member since his resignation from Success Trade.

FINRA retains jurisdiction over Brahmbhatt pursuant to Article V, Section 4(a) of FINRA's By-Laws because (1) the conduct that serves as the basis for this action commenced prior to Brahmbhatt's termination of registration from a FINRA member, (2) the AWC has been filed within two years after the effective date of

his last termination of registration from a FINRA member, and (3) this action charges Brahmbhatt with failing to respond to a FINRA request for information during the two-year period after the date upon which he ceased to be registered or associated with a FINRA member.

FACTS AND VIOLATIVE CONDUCT

From at least April 2009 to April 2013, Brahmbhatt was a registered representative with Success Trade. During that time, Brahmbhatt met with Success Trade customers and discussed Success Trade's promissory note investment issued by Success Trade's parent and holding company, Success Trade, Inc.

On April 10, 2013, FINRA filed a Complaint against Success Trade and its CEO and President, Fuad Ahmed, alleging that the Firm and Ahmed engaged in an \$18 million offering fraud in connection with the sale of the Notes (*Department of Enforcement v. Success Trade Securities, Inc., et al.*, Discip. Proc. No. 2012034211301). A disciplinary proceeding was held in this matter between August 26, 2013 and August 30, 2013.

On July 30, 2013, FINRA's staff sent Brahmbhatt a letter, pursuant to FINRA Rule 8210, requesting that he appear and testify at the above-referenced disciplinary proceeding. FINRA Rule 8210 requires an associated person "to provide information orally, in writing, or electronically...and to testify at a location specified by FINRA staff, under oath or affirmation" in connection with any proceeding. Brahmbhatt failed to appear and testify at the disciplinary proceeding. Accordingly, Brahmbhatt's failure to appear for testimony violated FINRA Rules 8210 and 2010.

B. I also consent to the imposition of the following sanction:

A bar from associating with any FINRA member in any capacity.

I understand that if I am barred or suspended from associating with any FINRA member, I become subject to a statutory disqualification as that term is defined in Article III, Section 4 of FINRA's By-Laws, incorporating Section 3(a)(39) of the Securities Exchange Act of 1934. Accordingly, I may not be associated with any FINRA member in any capacity, including clerical or ministerial functions, during the period of the bar or suspension (see FINRA Rules 8310 and 8311).

The sanctions imposed herein shall be effective on a date set by FINRA staff. Pursuant to FINRA Rule 8313(e), a bar or expulsion shall become effective upon approval or acceptance of this AWC.

II.

WAIVER OF PROCEDURAL RIGHTS

I specifically and voluntarily waive the following rights granted under FINRA's Code of Procedure:

- A. To have a Complaint issued specifying the allegations against me;
- 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, I 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.

I further specifically and voluntarily waive 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

I understand 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 me; and

C. If accepted:

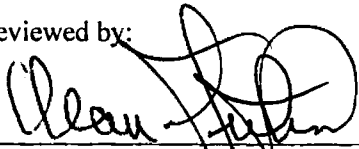
1. this AWC will become part of my permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against me;
2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about my disciplinary record;
3. FINRA may make a public announcement concerning this agreement and the subject matter thereof in accordance with FINRA Rule 8313; and
4. I 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. I 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 my: (i) testimonial obligations; or (ii) right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party.

I certify that I have read and understand all of the provisions of this AWC and have been given a full opportunity to ask questions about it; that I have 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 me to submit it.

11/04/2013
Date (mm/dd/yyyy)


Jinesh P. Brahmhatt

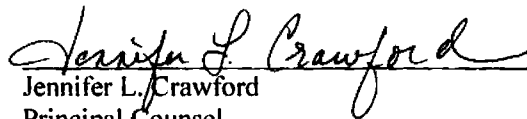
Reviewed by:


Alan S. Futerfas
Counsel for Respondent
Law Offices of Alan S. Futerfas
565 Fifth Avenue, 7th Floor
New York, New York 10017
Tel: 212-684-8400

Accepted by FINRA:

11/15/2013
Date

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


Jennifer L. Crawford

Principal Counsel

FINRA Department of Enforcement

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