

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 2012034475001**

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

RE: Range Global LLC, f/k/a Navpoint, LLC Respondent
Member Firm
BD No. 104393

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, Range Global LLC f/k/a Navpoint, LLC ("Range Global" or the "Firm") 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 the Firm alleging violations based on the same factual findings described herein.

I.

ACCEPTANCE AND CONSENT

- A. The Firm 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

Range Global has been a FINRA member firm since January 25, 2001. The Firm is headquartered in New York, New York. The Firm has one branch office and currently employs approximately 12 registered persons.

RELEVANT DISCIPLINARY HISTORY

In 2013, Range Global submitted an AWC through which the Firm was censured and fined \$150,000. Range Global consented to the entry of findings that in connection with activity at the Firm's New Jersey branch office, which is now closed, the Firm violated anti-money laundering rules by failing to establish and implement policies and procedures reasonably expected to monitor for, detect, and cause the reporting of suspicious activities, and failing to conduct due diligence and obtain the required certification for a foreign correspondent account; violated NASD Conduct Rule 2110 by executing trades in contravention of Section 5 of the Securities Act of 1933 in connection with the sale of approximately one billion unregistered shares of three stocks into the public

markets without an applicable exemption from registration; failed to conduct adequate due diligence into the circumstances surrounding the clients' acquisition and sale of the stock; failed to establish and maintain a system to supervise the sales of unregistered securities; and violated NASD Conduct Rules 3010, 3012 and 2110 and FINRA Rule 2010 by failing to establish, maintain, and enforce adequate written supervisory procedures and a system of supervisory control policies and procedures.

OVERVIEW

This matter concerns Range Global's failure to supervise the outside securities activity of two registered representatives and the Firm's failure to record the transactions on its books and records. Range Global violated NASD Conduct Rules 3040 and 3010 and FINRA Rule 2010 in connection with its failure to supervise and record on its books certain private securities transactions. Additionally, the Firm violated Rules 4511 and 2010 for failing to maintain accurate books and records.

FACTS AND VIOLATIVE CONDUCT

In December 2011, a registered representative of Range Global notified the Firm that he intended to solicit investors outside the scope of his employment with the Firm to raise funds for an energy-related venture in Singapore. The funds were to be raised through a newly-formed entity called Energy Global Partners LLC ("EGP"). In January 2012, a second registered representative of Range Global notified Range Global that he also intended to solicit investors outside the scope of his employment with the Firm to raise funds for EGP and further advised that he intended to become the manager of EGP and its managing member, GO Group LLC.

These two registered representatives' disclosed solicitation of investors concerning EGP outside of their employment with the Firm constituted private securities transactions within the definition of NASD Conduct Rule 3040(e). However, Range Global failed to evaluate reasonably the proposed activity to determine whether it should have been treated as a private securities transaction subject to the requirements of NASD Rule 3040. As a result, Range Global erroneously approved the two registered representatives' proposed solicitation of investors for EGP as an outside business activity as opposed to a private securities transaction.

Thereafter, between February 16, 2012 and June 28, 2012, the two registered representatives, while registered through Range Global, participated in private securities transactions by soliciting investors for a private offering of membership interests in EGP. Range Global, however, failed to supervise adequately their conduct with respect to the EGP private securities transactions and failed to record the private securities transactions on its books and records.

As a result of the foregoing conduct, Range Global violated NASD Conduct Rules 3040 and 3010 and FINRA Rule 2010 in connection with its failure to supervise and record GAR's and RMO's private securities transactions. The Firm also violated FINRA Rules 4511 and 2010 in connection with its failure to maintain adequate books and records.

B. The Firm also consents to the imposition of the following sanctions:

1. A censure; and
2. A fine of \$20,000.

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

The Firm 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.

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

II.

WAIVER OF PROCEDURAL RIGHTS

The Firm 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, the Firm 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 acceptance or rejection of this AWC.

The Firm 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

The Firm 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 the Firm; and
- C. If accepted:
 - 1. this AWC will become part of the Firm's permanent disciplinary record and may be considered in any future actions brought by FINRA or any other regulator against the Firm;
 - 2. this AWC will be made available through FINRA's public disclosure program in response to public inquiries about the Firm's 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. the Firm 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. The Firm 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 the Firm's: (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.

- D. The Firm may attach a Corrective Action Statement to this AWC that is a statement of demonstrable corrective steps taken to prevent future misconduct. The Firm understands that the Firm 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.

The undersigned, on behalf of the Firm, certifies that a person duly authorized to act on its 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 the Firm 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 the Firm to submit it.

6.2.14
Date

Range Global LLC

By: 

Brian W. Mitchell
Chief Compliance Officer

Reviewed by:


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Accepted by FINRA:

June 13, 2014
Date

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


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