

FINRA
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**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 20140401118-01**

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

RE: BNP Paribas Securities Corp., Respondent
Broker-Dealer
CRD No. 15794

Pursuant to FINRA Rule 9216 of FINRA's Code of Procedure, BNP Paribas Securities Corp. (the "firm" 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

The firm has been a member of FINRA since December 27, 1984, and its registration remains in effect.

RELEVANT DISCIPLINARY HISTORY

On March 15, 2013, FINRA accepted an AWC in which the firm was censured and fined \$45,000, which included a fine of \$20,000 for Trade Reporting and Compliance Engine ("TRACE") reporting violations for conduct that occurred in the 1st quarter of 2011.

On August 25, 2010, FINRA accepted an AWC in which the firm was censured and fined \$77,500, which included a fine of \$20,000 for TRACE reporting violations for conduct that occurred in the 4th quarter of 2008.

SUMMARY

In Review No. 20140401118, the TRACE staff of the Department of Market Regulation (the “staff”) reviewed the firm’s compliance with FINRA rules applicable to TRACE reporting of Corporate Debt securities during the period October 1, 2013 through December 31, 2013 (the “4Q13 review period”).

In Review No. 20140410753, the staff reviewed the firm’s compliance with FINRA rules applicable to TRACE reporting of Securitized Products during the period January 1, 2014 through March 31, 2014 (the “1Q14 review period”).

In Review No. 20140431287, the staff reviewed the firm’s compliance with FINRA rules applicable to TRACE reporting of Agency Debt securities during the period July 1, 2014 through September 30, 2014 (the “3Q14 Agency review period”).

In Review No. 20140431469, the staff reviewed the firm’s compliance with FINRA rules applicable to TRACE reporting of Corporate Debt securities during the period July 1, 2014 through September 30, 2014 (the “3Q14 Corporate review period”).

Based on the foregoing reviews, the staff determined that the firm engaged in the violative conduct set forth below.

FACTS AND VIOLATIVE CONDUCT

In connection with Review No. 20140401118,

1. During the 4Q13 review period, the firm failed to report to TRACE 756 S1 transactions in TRACE-eligible Corporate Debt securities within 15 minutes of the time of execution. These late transactions constituted 3.09 percent of the S1 transactions in TRACE-eligible Corporate Debt securities that the firm reported to TRACE during the 4Q13 review period. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6730(a) and a pattern or practice of late reporting without exceptional circumstances in violation of FINRA Rule 2010.
2. During the 4Q13 review period, the firm failed to report to TRACE the correct market identifier for 65 P1 transactions in TRACE-eligible Corporate Debt securities. These transactions constituted 16.97 percent of the P1 transactions in TRACE-eligible Corporate Debt securities that the firm should have reported to TRACE during the 4Q13 review period. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6730(d)(4)(C).

3. During the 4Q13 review period, the firm failed to report to TRACE the correct time of trade execution for 43 P1 transactions in TRACE-eligible Corporate Debt securities. These inaccurate reports constituted 11.23 percent of the P1 transactions in TRACE-eligible Corporate Debt securities that the firm should have reported to TRACE during the 4Q13 review period. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6730(c)(8).

In connection with Review No. 20140410753,

4. During the 1Q14 review period, the firm failed to report to TRACE the correct time of trade execution for 617 transactions in TRACE-eligible Securitized Products. These inaccurate reports constituted 7.49 percent of the 8,239 matched inter-dealer reports in TRACE-eligible Securitized Products that the firm submitted to TRACE during the 1Q14 review period. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6730(c)(8).
5. During the 1Q14 review period, the firm failed to show the correct time of execution on the memorandum of 617 brokerage orders. The conduct described in this paragraph constitutes separate and distinct violations of SEC Rule 17a-3 and FINRA Rule 4511(a).

In connection with Review No. 20140431287,

6. During the 3Q14 Agency review period, the firm failed to report to TRACE 76 S1 transactions in TRACE-eligible Agency Debt securities within 15 minutes of the time of execution. These late transactions constituted 4.63 percent of the S1 transactions in TRACE-eligible Agency Debt securities that the firm reported to TRACE during the 3Q14 Agency review period. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6730(a) and a pattern or practice of late reporting without exceptional circumstances in violation of FINRA Rule 2010.

In connection with Review No. 20140431469,

7. During the 3Q14 Corporate review period, the firm failed to report to TRACE 906 transactions in TRACE-eligible Corporate Debt securities within 15 minutes of the time of execution. These late transactions constituted 3.85 percent of the transactions in TRACE-eligible Corporate Debt securities that the firm reported to TRACE during the 3Q14 Corporate review period. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6730(a) and a pattern or practice of late reporting without exceptional circumstances in violation of FINRA Rule 2010.

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

A censure and a fine of \$50,000.

Respondent agrees to pay the monetary sanction(s) upon notice that this AWC has been accepted and that such payment(s) are due and payable. It 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 that it is unable to pay, now or at any time hereafter, the monetary sanction(s) imposed in this matter.

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

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 the firm;
- 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 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 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

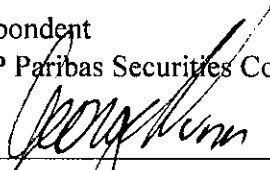
Respondent understands that:

- 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 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 accordance with FINRA Rule 8313;
 - 3. FINRA may make a public announcement concerning this agreement and the subject matter thereof 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 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. Respondent 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 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.

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 it 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 herein and the prospect of avoiding the issuance of a Complaint, has been made to induce the firm to submit it.

July 14, 2015
Date

Respondent
BNP Paribas Securities Corp.

By: 

Name: GEORGE NUNN

Title: COO for Global Markets Americas

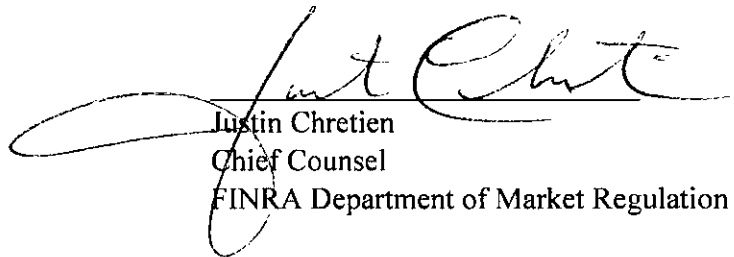
Reviewed by:

Attorney Name
Counsel for Respondent

Accepted by FINRA:

8-7-15
Date

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


Justin Chretien
Chief Counsel
FINRA Department of Market Regulation