

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER AND CONSENT
NO. 20150463347-01**

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") 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

Respondent became a member of FINRA in 1984 and its registration remains in effect.

RELEVANT DISCIPLINARY HISTORY

On August 7, 2015, FINRA accepted an AWC in connection with FINRA Matter No. 20140401118, in which the firm was censured and fined \$50,000 for violations of FINRA Rules 6730(a), 6730(c)(8) and 2010.

SUMMARY

In connection with STAR No. 20150463347, the Trade Reporting and Compliance Engine ("TRACE") Corporate Debt team of the Market Regulation Department (the "Staff") reviewed the firm's compliance with FINRA rules applicable to reporting of Corporate Debt transactions to TRACE during the periods of April 1, 2015 through June 30, 2015 ("2Q15"), July 1, 2015 through September 30, 2015 ("3Q15") and October 1, 2015 through December 31, 2015 ("4Q15") (collectively the "Review Period").

In connection with STAR No. 20150468690, the TRACE Corporate Debt team reviewed the firm's compliance with FINRA rules applicable to reporting of Corporate Debt inter-dealer transactions reported to TRACE during 2Q15.

FACTS AND VIOLATIVE CONDUCT

1. During 2Q15, the firm failed to report to TRACE the accurate time of execution for 95 Corporate Debt inter-dealer transactions. These transactions constitute 4.31 percent of the 2,205 Corporate Debt inter-dealer transactions that the Firm reported to TRACE during the Review Period. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 6730(c)(8).
2. During 2Q15, the firm failed to record the correct time of execution on the memorandum of 93 brokerage orders of Corporate Debt transactions. The conduct described in this paragraph constitutes separate and distinct violations of FINRA Rule 4511 and Rule 17a-3 of the Securities Exchange Act of 1934 ("Exchange Act").
3. During 2Q15, the firm failed to report to TRACE 188 transactions in TRACE-eligible Corporate Debt Securities within 15 minutes of the time of execution. 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.
4. During 3Q15, the firm failed to report to TRACE 75 transactions in TRACE-eligible Corporate Debt Securities within 15 minutes of the time of execution. 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.
5. During 4Q15, the firm failed to report to TRACE 100 transactions in TRACE-eligible Corporate Debt Securities within 15 minutes of the time of execution. 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.
6. During the Review Period, the firm failed to enforce its written supervisory procedures in violation of FINRA Rules 2010 and 3110.

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

A censure and a fine of \$85,000 (\$67,500 for violations of FINRA Rules 6730(a), 6730(c)(8) and 4511 and Rule 17a-3 of the Exchange Act; and \$17,500 for violations of FINRA Rules 2010 and 3110).

Respondent agrees to pay the monetary sanction upon notice that this AWC has been accepted and that such payment is 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 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.

9/28/16
Date

Respondent
BNP Paribas Securities Corp.

By: [Signature]
Name: George Min
Title: COO

Reviewed by:

Counsel for Respondent

Accepted by FINRA:

10/17/2016
Date

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

[Signature]
Lara Posner
Chief Counsel, Legal Section
FINRA Department of Market Regulation