

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT
NO. 2025085776501**

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

RE: Eduardo Leon (Respondent)
General Securities Principal and General Securities Representative
CRD No. 2232647

Pursuant to FINRA Rule 9216, Respondent Eduardo Leon 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 in this AWC.

I.

ACCEPTANCE AND CONSENT

- A. Respondent accepts and consents to the following findings by FINRA without admitting or denying them:

BACKGROUND

Leon entered the securities industry in 1992 when he registered as a General Securities Representative (GSR) and a General Securities Principal (GP) through an association with a FINRA member. In July 1994, Leon became registered as a GSR and a GP through an association with Global Financial Services, LLC, where he currently remains associated. On April 23, 2025, Global Financial submitted a FINRA Rule 4530 filing disclosing that the firm had taken disciplinary action against Leon for borrowing \$750,000 from a customer without seeking or obtaining approval from the firm.¹ On May 8, 2025, FINRA suspended Leon for four months and fined him \$7,500 for willfully violating Rule 15c-1 of the Securities Exchange Act of 1934 and violating FINRA Rules 2111 and 2010 by recommending a volatility-linked exchange-traded note and a foreign-currency-denominated corporate bond that were not in the best interest of three retail customers and not suitable for several non-retail customers.

OVERVIEW

In 2017 and 2022, Leon borrowed \$750,000 from one of his securities customers without notifying or obtaining approval from Global Financial, violating FINRA Rules 3240 and 2010. For these violations, Leon is suspended for two months and fined \$5,000.

¹ For more information about the respondent, including prior regulatory events, visit BrokerCheck® at www.finra.org/brokercheck.

FACTS AND VIOLATIVE CONDUCT

This matter originated from Global Financial's April 2025 FINRA Rule 4530 filing.

During the relevant period, FINRA Rule 3240 prohibited registered persons from borrowing money from their customers unless (1) the registered person's member firm had written procedures allowing such loans; (2) the borrowing arrangement met one of five conditions, including that the arrangement was based on a personal relationship with the customer such that the loan would not have been given had the customer and the registered person not maintained the relationship; and (3) when the borrowing arrangement was based on a personal relationship, the registered person gave prior notice of the loan to the member firm and received prior written approval. A violation of FINRA Rule 3240 also constitutes a violation of FINRA Rule 2010, which requires associated persons, in the conduct of their business, to observe high standards of commercial honor and just and equitable principles of trade.

In August 2017, after Leon's home was damaged during Hurricane Harvey, he borrowed \$250,000 from one of his customers, a wealthy person who had been his friend for 25 years. In September 2022, Leon borrowed \$500,000 more from the same customer. Neither loan was documented and Leon has not repaid any portion of either loan. At all relevant times, Global Financial's written procedures prohibited registered persons from borrowing money from their customers without the firm's prior written approval. However, Leon did not notify Global Financial about, or receive the firm's approval for, either loan. In April 2025, Global Financial discovered the loans and disciplined Leon by suspending him for one month and requiring him to forfeit two months' commissions.

By borrowing money from a customer without his firm's approval, Leon violated FINRA Rules 3240 and 2010.

SANCTIONS CONSIDERATIONS

In determining the appropriate sanctions in this matter, FINRA considered, among other factors, that Leon was suspended for one month and required to forfeit two months' commissions by Global Financial for the misconduct described in this AWC.

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

- a two-month suspension from associating with any FINRA member in all capacities and
- a \$5,000 fine.

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 he proposes to pay the fine imposed.

Respondent specifically and voluntarily waives any right to claim an inability to pay, now or at any time after the execution of this AWC, the monetary sanction imposed in this matter.

Respondent understands that if he is barred or suspended from associating with any FINRA member, he becomes 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, he 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 in this AWC shall be effective on a date set by FINRA.

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 him;
- 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 its acceptance or rejection.

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 Respondent's permanent disciplinary record and may be considered in any future action brought by FINRA or any other regulator against Respondent;
 - 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 its subject matter in accordance with FINRA Rule 8313;
 - 4. this AWC may be taken into consideration by employers and other regulatory or licensing entities or authorities in their hiring, retention, licensing, or other decisions. This AWC may also have other adverse collateral consequences outside of FINRA's control; and
 - 5. 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. Nothing in this provision affects Respondent's testimonial obligations in any litigation or other legal proceedings.
- 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 he 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.

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

1/8/26
Date


Eduardo Leon
Respondent

Reviewed by:

Andrew R. Harvin
Counsel for Respondent
Doyle, Restrepo, Harvin & Robbins, LLP
The Lyric Centre
440 Louisiana, Suite 2300
Houston, Texas 77002

Accepted by FINRA:

01/09/2026
Date

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



Alex Marinello
Principal Counsel
FINRA
Department of Enforcement
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Jericho, NY 11753