

TRAVIS J. ILES
SECURITIES COMMISSIONER



CLINTON EDGAR
DEPUTY SECURITIES COMMISSIONER

Mail: P.O. BOX 13167
AUSTIN, TEXAS 78711-3167

Phone: (512) 305-8300
Facsimile: (512) 305-8310

Texas State Securities Board

208 E. 10th Street, 5th Floor
Austin, Texas 78701-2407
www.ssb.texas.gov

BETH ANN BLACKWOOD
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MEMBER

DAVID A. APPELBY
MEMBER

ALAN WALDROP
MEMBER

MIGUEL ROMANO, JR.
MEMBER

IN THE MATTER OF THE
DEALER REGISTRATION OF
TRADE-PMR INC.

§
§
§

Order No. IC18-CAF-03

TO: Robb W. Baldwin, President/CEO
Trade-PMR Inc. (CRD No. 46350)
P.O. Box 358230
Gainesville, FL 32635-8230

DISCIPLINARY ORDER

Be it remembered that Trade-PMR Inc. ("Respondent"), appeared before the Securities Commissioner of the State of Texas ("Securities Commissioner") and consented to the entry of this order ("Order") and the Findings of Fact and the Conclusions of Law contained herein.

FINDINGS OF FACT

1. Respondent has waived (a) Respondent's rights to notice and hearing in this matter; (b) Respondent's rights to appear and present evidence in this matter; (c) Respondent's rights to appeal this Order; and (d) all other procedural rights granted to the Respondent by The Securities Act, Tex. Rev. Civ. Stat. Ann. arts. 581-1 to 581-45 (West 2010 & Supp. 2017) ("Texas Securities Act"), and the Administrative Procedure Act, Tex. Gov't Code Ann. §§ 2001.001 to 2001.902 (West 2008 & Supp. 2017) ("Administrative Procedure Act").
2. On July 12, 1999, Respondent registered with the Securities Commissioner as a dealer. This registration is currently effective.
3. Respondent provides brokerage and technology services to persons and entities acting as independent investment advisers ("Advisers").

4. In connection with their services, Respondent offers a desktop advisor workstation through which the Advisers can place trades with Respondent. The trades are introduced to an independent clearing broker-dealer, which will execute the transactions and custody the securities.
5. In this regard, Respondent is acting as a dealer in Texas with respect to the Advisers and the Advisers' clients.
6. Under the terms of their agreements with Respondent, Advisers are obligated to notify Respondent of changes in their registration status.
7. Respondent further established written supervisory procedures relating to its relationships with and on-going due diligence of the Advisers that included collecting information from Advisers designed, in part, to confirm the Advisers' ongoing registration and compliance with their obligations under their agreements with Respondent.
8. During July 2014 through January 2017 (the "Relevant Period"), sixty (60) of the Advisers were located in Texas and had been registered with the Securities Commissioner as an investment adviser.
9. Respondent was unable to detect that the registrations of two Advisers had lapsed for failure to pay annual renewal fees because it did not collect the relevant information. Accordingly, the two Advisers continued placing trades in their clients' accounts through Respondent during the period for which the two Advisers were not registered with the Securities Commissioner as investment advisers for a time during the Relevant Period.
10. Respondent provided significant cooperation throughout the Staff's investigation.


CONCLUSIONS OF LAW

1. Respondent failed to enforce its written supervisory procedures when it did not obtain due diligence documents required under its written supervisory procedures from the Advisers. This failure is a violation of §115.10 of the Rules and Regulations of the Texas State Securities Board ("Board Rules").
2. Pursuant to Section 14.A(6) of the Texas Securities Act, the aforementioned violation of a Board Rule constitutes a basis for the issuance of an Order reprimanding Respondent.
3. Pursuant to Section 23-1 of the Texas Securities Act, the foregoing violation of a Board Rule constitutes a basis for assessing an administrative fine against Respondent.

ORDER

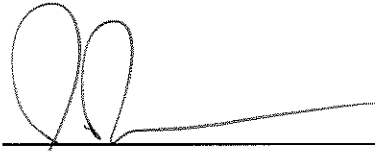
1. It is therefore ORDERED that Trade-PMR Inc. is hereby REPRIMANDED.
2. It is further ORDERED that Trade-PMR Inc. is hereby ASSESSED an ADMINISTRATIVE FINE in the amount of Twenty-Five Thousand Dollars (\$25,000). Payment shall be made by delivery of a cashier's check to the Securities Commissioner in the amount of Twenty-Five Thousand Dollars (\$25,000), payable to the State of Texas, contemporaneously with the delivery of this Order.
3. Respondent further agrees to contribute Five Thousand Dollars (\$5,000) within ten (10) days of the entry of this Order to be used for investor education efforts in Texas to the Investor Education Fund of the Investor Protection Trust, 1020 Nineteenth Street NW, Suite 890, Washington D.C. 20036-6123.

SIGNED AND ENTERED BY THE SECURITIES COMMISSIONER this 5th
day of November, 2018.



TRAVIS J. ILES
Securities Commissioner

Respondent:



Trade-PMR Inc.
By: James Halvosa
Chief Compliance Officer

Approved as to Form:



Clinton Edgar
Deputy Securities Commissioner



Dionne C. Fajardo
Wland Guerra King, P.A.
Attorney for Respondent

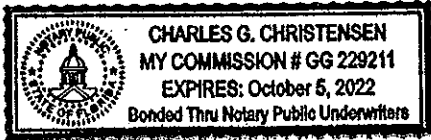


Cristi Ramón Ochoa
Attorney
Inspections and Compliance Division

ACKNOWLEDGMENT

On this 25 day of October, 2018, Trade-PMR Inc. ("Respondent"), by and through, James Halvosa, its Chief Compliance Officer, appeared before me, executed the foregoing Order, and acknowledged that:

1. James Halvosa is duly authorized to enter into the foregoing Order on behalf of Respondent;
2. James Halvosa has read the foregoing Order;
3. Respondent has been fully advised of its rights under the Texas Securities Act and the Administrative Procedure Act;
4. Respondent knowingly and voluntarily consents to the entry of the foregoing Order and the Findings of Fact and Conclusions of Law contained therein; and
5. Respondent, by consenting to the entry of the foregoing Order, has knowingly and voluntarily waived its rights as set forth therein.



[affix notary seal here]

Charles G Christensen
Notary Public in and for
The State of Florida
My commission expires on 10-5-2022