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**June 29, 2021**

The Office of the Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Room 10915  
Washington, D.C. 20549-1090  
[apfilings@sec.gov](mailto:apfilings@sec.gov)

Re: In the Matter of The Application for Review of FINRA Final  
Decision, Complaint No. 2013035345701: Titan Securities and Brad  
C. Brooks

I enclose the following for filing in the above-numbered cause:

1. Application of Titan Securities and Brad C. Brooks for Review  
of Disciplinary Action Taken by FINRA and,
2. Notice of Appearance of Counsel for Titan Securities and Brad  
C. Brooks



J. Randle Henderson  
Counsel to Titan Securities and  
Brad C. Brooks  
8708 Technology Forest Pl., Suite 100A  
The Woodlands, Texas 77381  
Ph. (713) 870-8358

c: Celia Passaro  
Office of General Counsel  
FINRA  
1735 K Street, N.W.  
Washington, D.C. 20006  
[Ersilia.passaro@finra.org](mailto:Ersilia.passaro@finra.org)

UNITED STATES OF AMERICA  
Before the  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549  
SECURITIES EXCHANGE ACT OF 1934  
Admin. Proc. File No- \_\_\_\_\_

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IN THE MATTER OF THE APPLICATION OF

TITAN SECURITIES AND BRAD C. BROOKS

FOR REVIEW OF DISCIPLINARY ACTION TAKEN BY FINRA

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**SUMMARY OF FINRA'S DISCIPLINARY ACTION**

The Financial Industry Regulatory Association ("FINRA") conducted a cyclical examination of the books and records of Titan Securities ( CRD No. 131392) covering the period from July 2010 to March 2013 ("Covered Period"). At all times during the Covered Period, Brad C. Brooks (CRD No.1584633) was the registered principal and chief compliance officer of Titan. Following FINRA's examination of Titan, the FINRA Department of Enforcement filed Disciplinary Action Complaint No. 2013035345701.

FINRA sought various sanctions against Titan and Brooks for violations of Exchange Act Rules and FINRA Rules, including allegations of willful misrepresentations by Titan and Brooks and willful failures by Titan and Brooks to supervise a registered representative's outside business activities

The NAC held (a) Titan and Brooks willfully violated Section (c) of the Exchange Act, Rule 15c2-4 and FINRA Rule 2010 and suspended Brooks in all principal and supervisory capacities for one year; (b) Titan and Brooks willfully violated Exchange Act Rule 10b-9 and FINRA Rule 2010, and suspended Brooks for an additional one year and (c) Titan and Brooks and were ordered to pay a \$50,000 fine, jointly and severally, for each of the violations. Brooks was ordered to requalify as a principal by examination. The Hearing Panel found that FINRA enforcement failed to prove Titan and Brooks' alleged violations were willful because the substantial evidence relied upon by FINRA failed to prove that they acted with intent.

Titan and Brooks respectfully ask the Commission to permit the filing of an Application for Review of the Disciplinary Action Taken by the Financial Industry Regulatory Association because the NAC failed to properly apply the facts in accordance with FINRA Rules and Notices to Members reversing the findings of the FINRA Hearing Panel.

Respectfully submitted,



J. Randle Henderson

Dated: June 29, 2021

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Licensed on 09/24/2021

Counsel to Brad C. Brooks and Titan Securities

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY AND REPRESENT THAT ON JUNE 29, 2021, I SERVED A TRUE COPY OF THE FOREGOING APPLICATION FOR REVIEW ON CELIA PASSARO, OFFICE OF GENERAL COUNSEL, FINANCIAL INSTITUTION REGULATORY ASSOCIATION BY EMAIL AT [ersilia.passaro@finra.org](mailto:ersilia.passaro@finra.org)**

