

**CERTIFICATION OF THE RECORD
TO THE SECURITIES AND EXCHANGE COMMISSION**

IN THE MATTER OF

**THE NEW MEMBER APPLICATION OF
BERING STRAIT SECURITIES, INC.**

**ADMINISTRATIVE PROCEEDING FILE NO. 3-16262
(APPLICATION NO. 20130379350)**

Description		Bates No.
Request to Review Decision Regarding New Membership Application of Bering Strait Securities, Inc. with multiple attachments, dated February 24, 2014 (received March 10, 2014)		000001
Appeal Acknowledgement letter, dated March 12, 2014		000209
Index of Record, dated March 26, 2014		000233
<u>Record Produced by Member Regulation</u>		
1	FINRA's decision dated February 18, 2014 denying the new member application ("NMA") filed by Bering Strait Securities, Inc. ("Applicant") on August 12, 2013	000239
2	Initial NMA filed on August 12, 2013 by Applicant	000249
	<ul style="list-style-type: none"> • 2a: NMA amendment dated August 13, 2013 	000283
	<ul style="list-style-type: none"> • 2b: NMA amendment dated October 24, 2013 	000317
	<ul style="list-style-type: none"> • 2c: NMA amendment dated December 12, 2013 	000357
	<ul style="list-style-type: none"> • 2d: NMA amendment dated February 3, 2014 	000397
	<ul style="list-style-type: none"> • 2e: MRDT screenshot evidencing dates NMA amendments were filed 	000439
3	Applicant's Business Plan	000441
4	NASD Rule 1014(a)(7) – Sources of Capital	
	<ul style="list-style-type: none"> • 4a: FINRA's request letter dated September 11, 2013 and Applicant's response letter dated October 23, 2013 	000457

	Description	Bates No.
	<ul style="list-style-type: none"> • 4b: FINRA’s request and supplemental request letter, both dated November 29, 2013, and Applicant’s response letter dated December 11, 2013 	000493
	<ul style="list-style-type: none"> • 4c: Flow of Capital as computed by Applicant 	000509
	<ul style="list-style-type: none"> • 4d: Maria Ermolova’s redacted credit card statements from April and May 2013 evidencing cash advances from her personal accounts 	000513
	<ul style="list-style-type: none"> • 4e: Maria Ermolova’s redacted credit card statements and receipts from July and August 2013 evidencing purchase and use of American Express for Target pre-paid cards and cash withdrawals 	000535
	<ul style="list-style-type: none"> • 4f: HSBC bank statements evidencing withdrawals from Applicant’s account 	000555
	<ul style="list-style-type: none"> • 4g: JPMorgan Chase bank statements evidencing deposits into Applicant’s account for net capital requirement 	000563
	<ul style="list-style-type: none"> • 4h: October 2013 cash advance of \$200 from Applicant’s JPMorgan Chase account to fund net capital requirement 	000573
	<ul style="list-style-type: none"> • 4i: January 26, 2014 letter from Dr. Mikhail Ermolova to FINRA, including bank statement in both English and Russian languages 	000575
	<ul style="list-style-type: none"> • 4j: Post-interview letter from Maria Ermolova to FINRA dated February 3, 2014 	000579
	<ul style="list-style-type: none"> • 4k: Emails and documents regarding outside, part-time employment 	000587
	<ul style="list-style-type: none"> • 4l: Bank and credit card statements evidencing available credit 	000595
	<ul style="list-style-type: none"> • 4m: Applicant’s analysis of available credit of Maria Ermolova and Applicant 	000633
	<ul style="list-style-type: none"> • 4n: FINRA’s analysis of Maria Ermolova’s available credit 	000635
5	NASD Rule 1014(a)(7) – Projected Revenues / Net Capital Insufficient to Cover Costs of Operation	

Description		Bates No.
	<ul style="list-style-type: none"> 5a: Maria Ermolova's Form 1099 from MidMarket Securities LLC 	000637
	<ul style="list-style-type: none"> 5b: Maria Ermolova's Form W2 from National Securities 	000639
	<ul style="list-style-type: none"> 5c: Applicant's Projection of Income and Expenses 	000641
	<ul style="list-style-type: none"> 5d: Applicant's Supporting Rationale for Monthly Projections of Income and Expenses 	000643
6	NASD Rule 1014(a)(8) – Inadequate Financial Controls	
	<ul style="list-style-type: none"> 6a: Trial Balance Sheet as of January 25, 2014 prepared by Applicant 	000647
	<ul style="list-style-type: none"> 6b: Balance Sheet as of January 25, 2014 prepared by Applicant 	000649
	<ul style="list-style-type: none"> 6c: Net Capital Computation as of January 25, 2014 prepared by Applicant 	000651
	<ul style="list-style-type: none"> 6d: Net capital computation prepared by FINRA for Applicant 	000653
	<ul style="list-style-type: none"> 6e: Credit card statements of Applicant and Maria Ermolova evidencing available balances 	000657
7	NASD Rule 1014(a)(10) – Inadequate supervisory system, written supervisory procedures, internal operating and compliance procedures	
	<ul style="list-style-type: none"> 7a: February 3, 2014 letter from Maria Ermolova to FINRA 	000665
	<ul style="list-style-type: none"> 7b: FINRA's request letter dated August 29, 2013 and Applicant's response dated August 30, 2013 	000673
	<ul style="list-style-type: none"> 7c: Statement of Maria Ermolova regarding compliance experience 	000683
8	NASD Rule 1014(a)(2) – Licensing & Registration	
	<ul style="list-style-type: none"> 8a: CRD Records for Maria Ermolova and Jeffrey Zygmunt 	000693
Hearing Notice, dated April 2, 2014		000707

Description		Bates No.
Member Regulation's Index for the Supplement to the Copy of Documents in this Matter, dated April 2, 2014		000711
Emails between Maria Ermolova and Melanie Campbell regarding waiver of the 45-day requirement, dated April 3-7, 2014		000719
Member Regulation's Corrected Index to the Supplement to the Copy of Documents in this Matter, dated April 3, 2014		000723
<u>Supplement to the Record Produced by Member Regulation</u>		
9	NMA dated August 12, 2013	
	• Name denial of Bering Strait, Inc.	000731
	• Bering Strait Securities, Inc.'s ("BSI" or "Applicant") Business Organizational Chart	000732
	• BSI's NY State Formation Documents	000733
	• FINRA New Member Application Fee Computation	000741
	• BSI's statement re: transactions without a clearing firm	000742
	• BSI's Management Organization Chart	000743
	• Email re: audit services	000744
	• Broker-Dealer Guard Bond	000745
	• Chase Bank Deposit Account - Agreement	000763
	• Chase Credit Card - Agreement	000773
	• Computer Crime Coverage Rider	000789
	• BSI's Engagement Agreement	000799
	• Fidelity Bond - Email	000808
	• BSI's Fidelity Bond Application	000810
	• Global Relay - Agreement	000819

	Description	Bates No.
	• Global Relay - Email	000823
	• GoDaddy General Agreement	000825
	• GoDaddy Hosting - Agreement	000845
	• Independent Contractor Agreement	000851
	• Nextiva Fax - Agreement	000861
	• Supplement to Master Lease Document	000868
	• 1601 Broad sublease	000870
	• Office Lease Agreement	000982
	• BSI's Business Continuity Disclosure Statement	000987
	• BSI's Business Continuity Plan	000988
	• American Express credit card statements & account activity since last statement (July 4 – August 2, 2013)	000994
	• BSI's Balance Sheet as of August 2, 2013	001005
	• Cash advance receipts from Chase account & corresponding deposits	001006
	• Chase On-Line Business Account Activity	001009
	• Chase Ink credit card statement	001010
	• Chase Slate credit card statements and account activity since last statement (August 3, 2013)	001014
	• Bank of America, Capital One, Chase Amazon, Citi and Discover credit card statements re: future funding	001039
	• BSI's Projection of Income and Expenses for March – December 2013	001057
	• Applicant's Explanation re: missing credit card statements	001059
	• Net Capital Computation – August 2013	001060

	Description	Bates No.
	• BSI's Statement on Subordination Agreements	001061
	• Supporting Rationale for Monthly Projection of Income and Expenses (first 12 months)	001062
	• BSI's Trial Balance – August 2, 2013	001066
	• Hofstra University Transcript for Maria Ermolova	001067
	• Outside Business Activities – Notification for FINOP	001071
	• Vanderbilt Transcript for Maria Ermolova	001072
	• W&J Transcript for Maria Ermolova	001074
	• SIPC General Assessment Payment Form	001077
	• Advertising Regulation Electronic Files (AREF) At-a-Glance Guide	001081
	• BSI's Branch Office Inspection Form	001097
	• FINRA 2012 Corporate Financing Public Offering System User Guide	001099
	• Dept. of Treasury Form FinCEN Form 105	001149
	• IRS Form 8300 – Cash Payments over \$10,000	001151
	• FinCen Currency Transaction report (FinCEN CTR)	001156
	• FinCen Suspicious Activity Report (FinCEN SAR) Electronic Filing Instructions	001234
	• FOCUS IIA Report (blank form)	001270
	• FOCUS Schedule 1 Report (blank form)	001279
	• SEC Forms (1-a, 3, 4, 5, 8-k, 10-k, 10-q, 13F, 144, F-1, TCR) (blank)	001286
	• BSI's Statement re: other reports	001424
	• BSI's WSPs	001425

Description		Bates No.
	<ul style="list-style-type: none"> • BSI's WSP Checklist 	001496
	<ul style="list-style-type: none"> • BSI's Form of Outside Business Activity 	001570
	<ul style="list-style-type: none"> • BSI's Outside Business Activity Notification 	001573
	<ul style="list-style-type: none"> • BSI's Cash Receipts and Disbursements Blotter - Chase Bank Account 	001574
	<ul style="list-style-type: none"> • BSI's Chase Credit Card Receipts and Disbursements Blotter 	001575
	<ul style="list-style-type: none"> • BSI's Client Ledger 	001577
	<ul style="list-style-type: none"> • BSI's Due Diligence Checklist Client Information 	001578
	<ul style="list-style-type: none"> • BSI's General Ledger - August 2013 	001586
	<ul style="list-style-type: none"> • BSI's Trial Balance – August 2013 	001587
	<ul style="list-style-type: none"> • BSI's Continuing Education Training Needs Analysis and Written Training Plan 	001588
	<ul style="list-style-type: none"> • BSI's Statement on Continuing Education Training Checklist 	001594
10	NMA Amendment dated August 13, 2013	
	<ul style="list-style-type: none"> • BSI's WSPs 	001595
	<ul style="list-style-type: none"> • BSI's Continuing Education Training Needs Analysis and Written Training Plan 	001666
	<ul style="list-style-type: none"> • BSI's Guide to Continuing Education Requirements 	001672
11	NMA Amendment dated October 24, 2013	
	<ul style="list-style-type: none"> • BSI's Balance Sheet – October 17, 2013 	001677
	<ul style="list-style-type: none"> • Bard Holding, Inc. – selected offering documents 	001678
	<ul style="list-style-type: none"> • BlueChip Power Systems – selected offering documents 	001939
	<ul style="list-style-type: none"> • Hepalife – selected offering documents 	001987

	Description	Bates No.
	• Maria Ermolova - Selected M&A Deals Experience	002322
	• Michael Orr's Resume	002325
	• BlueChip Energy Mutual Non-disclosure Agreement	002329
	• BSI's Net Capital Computation – October 17, 2013	002333
	• BSI's Projection of Income and Expenses – November 2013 – October 2014	002334
	• Soligenix – selected offering documents	002335
	• Sorrento Solar – selected offering documents	002814
	• BSI's Supporting Rationale for Monthly Projections of Income and Expenses (First 12 Months)	002847
	• BSI's Trial Balance as of October 17, 2013	002850
	• Maria Ermolova – Underwriting Deals Experience	002851
	• Ventrus Biosciences Inc. – selected offering documents	002857
	• Weikang Bio-Technology Group Co., Inc. – selected offering documents	003564
	• Wall Street Training documents	003899
	• BSI's Management Organization Chart – 1 st year	003905
	• BSI's Management Organization Chart	003906
	• Email and Response to BSI's request for exemption from Securities Information Center	003907
	• Training the Street – A Practical Guide to Wall Street Valuation	003909
	• Wall Street Training documents	004035
	• Blanket Fidelity Bond for Securities Dealers	004123

	Description	Bates No.
	• A Blanket Fidelity Bond for Securities Dealers - Declarations	004141
	• BSI's Designation of Accountant	004143
	• Letter dated October 8, 2013 from accountant to Ermolova	004146
	• World MasterCard BusinessCard Benefits	004150
	• Computer Crime Coverage Rider	004182
	• National Union Fire Ins. Co of Pittsburgh endorsement	004192
	• Global Relay Fee Agreement for BSI	004193
	• Selected Insurance Documents	004197
	• Email dated October 8, 2013 from Auditor	004201
	• Email re: Fidelity Bond Quote	004203
	• Global Relay E-sign Fee Agreement	004205
	• Google Terms of Service	004206
	• Sample Cancellation Rider	004212
	• New York Amendatory Endorsement	004213
	• PCAOB Registration Form	004217
	• Policyholder notice	004218
	• Registration Verification for Accountant	004219
	• BSI's Business Continuity Plan	004220
	• Credit Card statements and other account information for BSI and Maria Ermolova produced in October 24, 2013 amendment to the Form NMA	004226
	• BSI's Balance Sheet as of October 17, 2013	004352

Description		Bates No.
	<ul style="list-style-type: none"> • Credit Card statements and other account information for BSI and Ermolova produced in October 24, 2013 amendment to the Form NMA 	004353
	<ul style="list-style-type: none"> • BSI's Net Capital Computation as of October 17, 2013 	004674
	<ul style="list-style-type: none"> • Credit Card statements and other account information for BSI and Ermolova produced in October 24, 2013 amendment to the Form NMA 	004675
	<ul style="list-style-type: none"> • Listing of Accounts and Images of Credit Cards 	004727
	<ul style="list-style-type: none"> • Summary of Personal Accounts 	004731
	<ul style="list-style-type: none"> • BSI's Projection of Income and Expenses November 2013 - October 2014 	004732
	<ul style="list-style-type: none"> • Credit Card statements and other account information for BSI and Maria Ermolova produced in October 24, 2013 amendment to the Form NMA 	004733
	<ul style="list-style-type: none"> • BSI's Supporting Rationale for Monthly Projections of Income and Expenses (First 12 Months) 	004835
	<ul style="list-style-type: none"> • BSI's Trial Balance as of October 17, 2013 	004838
	<ul style="list-style-type: none"> • MidMarket Securities, LLC's FOCUS Report 	004839
	<ul style="list-style-type: none"> • BSI's WSPs 	004859
	<ul style="list-style-type: none"> • BSI's Cash Blotter Form 	004930
	<ul style="list-style-type: none"> • BSI's Client Ledger Form 	004931
	<ul style="list-style-type: none"> • BSI's Credit Card Blotter Form 	004932
	<ul style="list-style-type: none"> • BSI's Due Diligence Checklist – Client Information 	004933
	<ul style="list-style-type: none"> • BSI's General Ledger Form 	004941
12	NMA Amendment dated December 12, 2013	

Description		Bates No.
	<ul style="list-style-type: none"> • Maria Ermolova's Selected M&A Deals Experience, Selected Personal Relationships with Senior Investment Bankers, and Selected Underwriting Deals Experience 	004943
	<ul style="list-style-type: none"> • Selected credit card statements of BSI and Maria Ermolova, 2012-2013 	004954
13	NMA Amendment dated February 3, 2014	
	<ul style="list-style-type: none"> • BSI's By-Laws 	004987
	<ul style="list-style-type: none"> • Maria Ermolova's employment agreement from Mid-Market Securities, LLC 	004991
	<ul style="list-style-type: none"> • Maria Ermolova's employment agreement from National Securities Corporation 	005007
	<ul style="list-style-type: none"> • BSI's WSPs 	005013
	Letter to parties changing the hearing start time, dated April 11, 2014	005085
	Letter to parties identifying the hearing panel, dated April 21, 2014	005089
	Applicant's Exhibit List, dated April 22, 2014	005093
	<u>APPLICANT'S EXHIBITS</u>	
1	All exhibits in the Index of the Record (not reproduced)	
2	All exhibits in the Supplement to the record (not reproduced)	
3	Bering Strait, Inc. 2012 Tax Return	005107
4	Bering Strait Securities, Inc. ("BSS")2013 Tax Return	005123
5	Confirmation of \$300 NY fee payment	005139
6	BrokerCheck Report – Maria M. Ermolova ("Ermolova")	005141
7	Confirmation that CE requirement was satisfied	005149
8	Appeal Letter	005151
9	BSS Bank and credit card account balances, dated January 25, 2014	005169

	Description	Bates No.
10	Corrected net capital computation (correcting FINRA calculation)	005171
11	Net capital computation, dated January 25, 2014	005175
12	FINRA standards for admission	005177
13	Ermolova's U.S. residency application and attachments	005185
14	International University of Moscow academic transcript	005253
15	Updated WSPs	005255
16	Executed Membership Interview Checklist, dated January 28, 2014	005327
17	Email correspondence following Membership Interview	005331
18	Emails regarding first interview and application	005339
19	Two documents from FINRA re: Membership Interview	005343
20	Two documents re: definition of "substantially complete"	005349
21	Letter identifying Subcommittee	005353
22	Email re: revised Index	005355
23	Hearing Notice	005359
24	Email re: adding more documents	005361
25	Certificate of Service (confirming service of Index of Record)	005363
26	Index of Record	005365
27	Corrections to the Supplement to the Record (Original, Corrected Name, and Bates number change)	005369
28	Email re: waiver of time limit	005389
29	U4 Filings (Original and Amendment)	005391
30	BD filings (Original and Amendment)	005417
31	BR filing	005435
32	Fingerprints (Online status and Fingerprint card)	005439

Description		Bates No.
33	Form filing history	005441
34	Exams	005443
35	Mid-Market Securities, LLC – 2012 Annual Compliance Meeting and Firm Element – Memorandum and Agenda	005445
36	Documents submitted with the application but not provided by Member Regulation in the Index of the Record or Supplement to the Record (Blank SEC Form S-1 and Blank SEC Form D)	005449
Member Regulation’s Witness and Exhibit List, dated April 22, 2014		005469
<u>MEMBER REGULATION’S EXHIBITS</u>		
1	FINRA’s decision dated February 18, 2014 denying the new member application (“NMA”) filed by Bering Strait Securities, Inc. (“Applicant”) on August 12, 2013	005475
2	Initial NMA filed on August 12, 2013 by Applicant	005485
2a	NMA amendment dated August 13, 2013	005519
2b	NMA amendment dated October 24, 2013	005553
2c	NMA amendment dated December 12, 2013	005593
2d	NMA amendment dated February 3, 2014	005633
2e	MRDT screenshot evidencing dates NMA amendments were filed	005675
3	Applicant’s Business Plan	005677
4a	FINRA’s request letter dated September 11, 2013 and Applicant’s response letter dated October 23, 2013	005693
4b	4b: FINRA’s request and supplemental request letter, both dated November 29, 2013, and Applicant’s response letter dated December 11, 2013	005729
4c	4c: Flow of Capital as computed by Applicant	005745
4d	4d: Maria Ermolova’s redacted credit card statements from April and May 2013 evidencing cash advances from her personal accounts	005749

	Description	Bates No.
4e	4e: Maria Ermolova's redacted credit card statements and receipts from July and August 2013 evidencing purchase and use of American Express for Target pre-paid cards and cash withdrawals	005771
4f	4f: HSBC bank statements evidencing withdrawals from Applicant's account	005791
4g	JPMorgan Chase bank statements evidencing deposits into Applicant's account for net capital requirement	005799
4h	October 2013 cash advance of \$200 from Applicant's JPMorgan Chase account to fund net capital requirement	005809
4i	January 26, 2014 letter from Dr. Mikhail Ermolova to FINRA, including bank statement in both English and Russian languages	005811
4j	Post-interview letter from Maria Ermolova to FINRA dated February 3, 2014	005815
4k	Emails and documents regarding outside, part-time employment	005823
4l	Bank and credit card statements evidencing available credit	005831
4m	Applicant's analysis of available credit of Maria Ermolova and Applicant	005869
4n	FINRA's analysis of Maria Ermolova's available credit	005871
4o	Maria Ermolova's bank account statement and credit card statements regarding income from Airbnb	005873
5a	Maria Ermolova's Form 1099 from MidMarket Securities LLC	005897
5b	Maria Ermolova's Form W2 from National Securities	005899
5c	Applicant's Projection of Income and Expenses	005905
5d	5d: Applicant's Supporting Rationale for Monthly Projections of Income and Expenses	005909
6a	Trial Balance Sheet as of January 25, 2014 prepared by Applicant	005913
6b	Balance Sheet as of January 25, 2014 prepared by Applicant	005915

Description		Bates No.
6c	Net Capital Computation as of January 25, 2014 prepared by Applicant	005917
6d	Net capital computation prepared by FINRA for Applicant	005919
6e	Credit card statements of Applicant and Maria Ermolova evidencing available balances	005923
7a	February 3, 2014 letter from Maria Ermolova to FINRA	005931
7b	FINRA's request letter dated August 29, 2013 and Applicant's response dated August 30, 2013	005939
7c	Statement of Maria Ermolova regarding compliance experience	005949
8a	CRD Records for Maria Ermolova and Jeffrey Zygmunt	005959
9	BSS's sample Engagement Agreement	005973
9a	Selected Underwriting Deals Experience provided by Maria Ermolova	005983
9b	Selected M&A Deals Experience provided by Maria Ermolova	005989
	Letter from Ermolova to Colleen Durbin, FINRA Office of General Counsel attaching additional documentation for the record, dated May 7, 2014 (received May 9, 2014)	005993
	Member Regulation's objection to the additional documents presented by Applicant, dated May 9, 2014	006025
	Transcript of Hearing, dated April 29, 2014	006027
	Four additional documents presented by Applicant at hearing	006521
	Transcript of closing argument, dated May 16, 2014	006551
	Letter from Durbin to parties re: release of NAC Decision, dated September 22, 2014	006609
	Notice of NAC Decision and NAC Decision, dated October 2, 2014	006613
	Application for Review, dated November 3, 2014 (received November 6, 2014)	006639