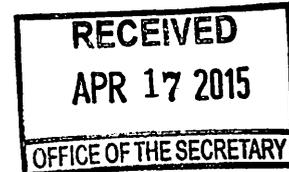


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April 15, 2015



Office of the Secretary
U.S. Securities and Exchange Commission
100 F Street, NE, Mail Stop 1090
Washington, DC 20549
Attention Secretary of the Commission, Brent Fields

REPLY BRIEF TO FINRA'S BRIEF IN OPPOSITION
ADMINISTRATIVE PROCEEDING No. 3-16264
COMPLAINT No. 2011030192201
FINRA Dept. of Enforcement vs. Alfred P. Reeves III

Acting Pro Se and without knowledge of specific procedures, Alfred P. Reeves III referring to himself as 'Reeves' puts forth the following as a REPLY BRIEF in support of Reeves request that FINRA erred in its decision to charge Reeves with conversion of funds when conversion of funds requires knowledge of the source of the funds which Reeves had no knowledge of and which was confirmed by FINRA's own investigator.

To believe FINRA's accusations, the SEC Hearing Panel would have to believe that Reeves had something to do with engineering the transfer of an amount of money even though the amount of money transferred couldn't possibly be due the broker-dealer as the broker-dealer did no business that would generate commissions and in fact, every month the broker-dealer had a net payout to the clearing agent.

To believe FINRA's accusations, the SEC Hearing Panel would have to believe that Reeves conspired to purposefully harm the broker-dealer.

To believe FINRA's accusations, the SEC Hearing Panel would have to believe that Reeves financial relationships with some of his banks would cause him to do something that would obviously ruin his 44 year career and respected position in the securities industry.

To believe FINRA's accusations, the SEC Hearing Panel would have to believe that Reeves background and standing in the securities industry which includes having been a FINRA regulator, having obtained all necessary principal licenses necessary to run any kind of brokerage firm, having been CFO, COO and CCO of many brokerage firms, both large and small, as the sole signatory handling millions of dollars of firm's income, expenses and capital during both good times and bad times, with never a dime missing, having the respect of William Clendenin, retired FINRA SVP who headed FINRA's Boston and New York district offices, who nominated Reeves who got elected to FINRA's New York District Committee and District Business Conduct Committee for a three year term and subsequently sat on many hearing panels regarding enforcement actions, having the respect of Joseph McCarthy, SVP of FINRA's Western Region headquartered in Denver who put forth Reeves to be nominated and then elected to FINRA's Western Region District Committee and having been accepted into FINRA's Dispute Resolution arbitration pool as an Arbitrator, named to its Chairman's List and having served on many arbitration panels for many years, is totally irrelevant.

To believe FINRA's accusations, the SEC Hearing Panel would have to believe that Reeves, with his long history and extensive knowledge of the securities industry was so stupid as to purposefully direct funds, created out of thin air by an error in Legent's back office, that didn't belong to him to an account easily identified and controlled by Reeves, guaranteeing Reeves would be found out and expelled from the securities industry.

FINRA has gone to extraordinary lengths through interpretation and opinions to make implications that are just not so. The simple truth is Reeves did not know and when he did know the money came from Legent, made an agreement with Legent to pay back the money. With no proof of Reeves' knowledge regarding the money and Reeves agreement to pay back the money, the case should have ended. Obviously, FINRA wanted to get Reeves out of the business for reasons I have already gone into before. FINRA's whole posture was unreasonable and even vindictive on the part of some of FINRA's Boca Raton staff.

I implore the Hearing Panel to vacate the NAC's decision, restore my licenses and let me get about the business of paying back the money.

Respectfully submitted,



Alfred P. Reeves III