



## IAPD Report

# SUSAN GRACE LABANT

CRD# 3229735

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Please contact FINRA with any concerns.



## **IAPD Information About Representatives**

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

### **What is included in a IAPD report?**

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

### **Where did this information come from?**

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

### **How current is this information?**

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

### **Need help interpreting this report?**

For help understanding how to read this report, please consult NASAA's IAPD Tips page <http://www.nasaa.org/IAPD/IARReports.cfm>

### **What if I want to check the background of an Individual Broker or Brokerage Firm?**

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

### **Are there other resources I can use to check the background of investment professionals?**

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association <http://www.nasaa.org>



## Report Summary

### SUSAN GRACE LABANT (CRD# 3229735)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **06/28/2024**.

### CURRENT EMPLOYERS

|           | Firm                               | CRD#      | Registered Since |
|-----------|------------------------------------|-----------|------------------|
| <b>B</b>  | ROBERT W. BAIRD & CO. INCORPORATED | CRD# 8158 | 06/22/1999       |
| <b>IA</b> | ROBERT W. BAIRD & CO. INCORPORATED | CRD# 8158 | 07/28/1999       |

### QUALIFICATIONS

This representative is currently registered in **4** SRO(s) and **1** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

**Note:** Not all jurisdictions require IAR registration or may have an exemption from registration.

Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

### REGISTRATION HISTORY

This representative was previously registered with the following firm(s):

| FIRM | CRD# | LOCATION | REGISTRATION DATES |
|------|------|----------|--------------------|
|------|------|----------|--------------------|

No information reported.

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

### DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative? **Yes**

The following types of events are disclosed about this representative:

| Type             | Count |
|------------------|-------|
| Regulatory Event | 1     |



## Qualifications

### REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works. This individual is currently registered with **1** jurisdiction(s) and **4** SRO(s) through his or her employer(s).

### Employment 1 of 1

Firm Name: **ROBERT W. BAIRD & CO. INCORPORATED**

Main Address: 777 E. WISCONSIN AVENUE  
MILWAUKEE, WI 53202-5391

Firm ID#: 8158

|           | Regulator               | Registration                      | Status   | Date       |
|-----------|-------------------------|-----------------------------------|----------|------------|
| <b>B</b>  | FINRA                   | General Securities Representative | Approved | 06/22/1999 |
| <b>B</b>  | FINRA                   | Operations Professional           | Approved | 10/18/2011 |
| <b>B</b>  | NYSE American LLC       | General Securities Representative | Approved | 08/23/1999 |
| <b>B</b>  | Nasdaq Stock Market     | General Securities Representative | Approved | 07/12/2006 |
| <b>B</b>  | New York Stock Exchange | General Securities Representative | Approved | 08/23/1999 |
| <b>B</b>  | Wisconsin               | Agent                             | Approved | 07/28/1999 |
| <b>IA</b> | Wisconsin               | Investment Adviser Representative | Approved | 07/28/1999 |

### Branch Office Locations

**ROBERT W. BAIRD & CO. INCORPORATED**  
777 E. WISCONSIN AVENUE  
MILWAUKEE, WI 53202

**ROBERT W. BAIRD & CO. INCORPORATED**  
New Berlin, WI



## Qualifications



### PASSED INDUSTRY EXAMS

This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

**This individual has passed 4 principal/supervisory exams, 5 general industry/product exams, and 1 state securities law exam.**

#### Principal/Supervisory Exams

|   | Exam                                                                   | Category  | Date       |
|---|------------------------------------------------------------------------|-----------|------------|
| B | Municipal Securities Principal Examination (S53)                       | Series 53 | 04/29/2002 |
| B | General Securities Principal Examination (S24)                         | Series 24 | 05/26/2000 |
| B | General Securities Sales Supervisor - General Module Examination (S10) | Series 10 | 05/26/2000 |
| B | General Securities Sales Supervisor - Options Module Examination (S9)  | Series 9  | 02/26/2000 |

#### General Industry/Product Exams

|   | Exam                                                     | Category    | Date       |
|---|----------------------------------------------------------|-------------|------------|
| B | Operations Professional Examination (S99TO)              | Series 99TO | 01/02/2023 |
| B | Securities Industry Essentials Examination (SIE)         | SIE         | 10/01/2018 |
| B | Research Analyst Exam - Part II Regulations Module (S87) | Series 87   | 09/23/2005 |
| B | Limited Representative-Equity Trader Exam (S55)          | Series 55   | 08/30/1999 |
| B | General Securities Representative Examination (S7)       | Series 7    | 06/20/1999 |

#### State Securities Law Exams

|   | Exam                                                 | Category  | Date       |
|---|------------------------------------------------------|-----------|------------|
| B | Uniform Securities Agent State Law Examination (S63) | Series 63 | 07/26/1999 |



## PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.

Only professional designations listed in Question 8 of the Form U4 will appear in this section if the appropriate box is checked and verified by the issuing organization at the time of the filing. Learn more about eligible designations at [IARD](#) and [NASAA](#).



## Registration & Employment History

### PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

No information reported.

### EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

| Employment Dates  | Employer Name                         | Position     | Investment Related | Employer Location               |
|-------------------|---------------------------------------|--------------|--------------------|---------------------------------|
| 04/1999 - Present | ROBERT W. BAIRD & CO.<br>INCORPORATED | NOT PROVIDED | Y                  | MILWAUKEE, WI,<br>United States |

### OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent, or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious, or fraternal and is recognized as tax exempt.

No information reported.



## Disclosure Summary

### Disclosure Information

**What you should know about reported disclosure events:**

**(1) Certain thresholds must be met before an event is reported to IARD, for example:**

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

**(2) Disclosure events in IAPD reports come from different sources:**

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

**(3) There are different statuses and dispositions for disclosure events:**

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
  - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
  - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
  - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
  - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
  - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
  - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

**(4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.**



## DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

| Type             | Count |
|------------------|-------|
| Regulatory Event | 1     |

### Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

#### Disclosure 1 of 1

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:** Other: N/A

**Date Initiated:** 08/19/2011

**Docket/Case Number:** [2008013127802](#)

**Employing firm when activity occurred which led to the regulatory action:** ROBERT W. BAIRD & CO. INC.

**Product Type:** No Product

**Allegations:** FINRA RULE 2010, NASD RULES 2110, 3010: LABANT FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, WITH RESPECT TO THE REQUIREMENTS OF REGULATION SHO (REG SHO). AS A RESULT OF LABANT'S FAILURES, AMONG OTHER REASONS, HER MEMBER FIRM EXPERIENCED SYSTEMATIC REG SHO-RELATED OPERATIONAL AND SUPERVISORY DEFICIENCIES THAT PERSISTED THROUGHOUT THE TIME LABANT WAS RESPONSIBLE FOR HER FIRM'S CAPITAL MARKETS DEPARTMENT'S REG SHO COMPLIANCE. THE POLICIES AND PROCEDURES WRITTEN AND/OR REVIEWED BY LABANT AND IMPLEMENTED BY THE FIRM WERE NOT REASONABLY DESIGNED TO ACHIEVE COMPLIANCE WITH CERTAIN REQUIREMENTS OF REG SHO. IN ADDITION, LABANT FAILED TO REVIEW AND/OR COORDINATE THE REG SHO-RELATED POLICIES AND PROCEDURES INSTITUTED IN DIFFERENT AREAS OF THE FIRM. UNDER THE SUPERVISION OF LABANT, THE FIRM IMPLEMENTED A PATCHWORK OF SYSTEMS, POLICIES, AND PROCEDURES THAT CONTAINED MULTIPLE GAPS AND, IN CERTAIN INSTANCES, CONTAINED INCORRECT



INSTRUCTIONS FOR COMPLIANCE WITH REG SHO. THE WRITTEN POLICIES AND PROCEDURES LABANT ESTABLISHED OR REVIEWED IN CONNECTION WITH REG SHO DID NOT REQUIRE: PROPRIETARY TRADERS TO OBTAIN LOCATES FOR SHORT SALES; THE STOCK LOAN DEPARTMENT TO GRANT AND DOCUMENT ALL LOCATES; ADEQUATE REVIEWS OF SHORT SALES TO DETECT SHORT SALES ENTERED WITHOUT A LOCATE AND/OR WITHOUT AN EXCEPTION TO THE LOCATE REQUIREMENTS; AND MARKET MAKERS ENGAGED IN NON-BONA FIDE MARKET MAKING TRANSACTIONS TO OBTAIN LOCATES FOR SHORT SALES (WHERE NO LOCATE EXCEPTION WAS APPLICABLE). LABANT FAILED TO COORDINATE STOCK LOAN'S ROLE IN THE FIRM'S REG SHO COMPLIANCE. THE FIRM'S STOCK LOAN EMPLOYEES WERE NOT ADEQUATELY TRAINED IN CONNECTION WITH REG SHO, INCLUDING THE LOCATE REQUIREMENT FOR PROPRIETARY SHORT SALES AND THE IMPORTANCE OF DOCUMENTING ALL LOCATE REQUESTS AND APPROVALS. AS A RESULT, THE STOCK LOAN DEPARTMENT'S COMPLIANCE WITH REG SHO REQUIREMENTS WAS INSUFFICIENT AND THE FIRM COMPLETELY FAILED TO DOCUMENT LOCATES FOR ITS PROPRIETARY ORDERS. MOREOVER, ALTHOUGH LABANT INFORMED STOCK LOAN EMPLOYEES THAT THEY WERE REQUIRED TO PROVIDE LOCATES FOR PROPRIETARY TRADERS, STOCK LOAN EMPLOYEES SUBSEQUENTLY INSTRUCTED PROPRIETARY TRADERS THAT THEY DID NOT NEED TO CONTACT STOCK LOAN FOR A LOCATE ON CERTAIN EXCHANGE TRADED FUNDS. THUS, LABANT'S ATTEMPT TO INFORM STOCK LOAN PERSONNEL REGARDING THE NEED TO PROVIDE LOCATES WAS ALSO INADEQUATE. AS A RESULT OF THE INADEQUATE POLICIES AND PROCEDURES LABANT ESTABLISHED, AMONG OTHER REASONS, THE FIRM RELEASED FOR EXECUTION 592 OUT OF 713 PROPRIETARY SHORT SALE ORDERS (83%) WITHOUT OBTAINING AND/OR DOCUMENTING LOCATES DURING THE PERIOD JANUARY TO MARCH 2007 ALONE. IN SOME INSTANCES, STOCK LOAN PERSONNEL FAILED TO DOCUMENT LOCATES THAT PROPRIETARY TRADERS REQUESTED AND OBTAINED. HOWEVER, IN THE MAJORITY OF INSTANCES, LOCATES WERE NOT OBTAINED AT ALL. THE FIRM'S PROPRIETARY TRADERS ALSO ENTERED AN INDETERMINABLE NUMBER OF UNEXECUTED SHORT SALE ORDERS FOR WHICH NO LOCATES WERE OBTAINED OR DOCUMENTED. FURTHERMORE, THE SYSTEMS AND PROCEDURES LABANT ESTABLISHED FOR SUPERVISION AND REVIEW OF REG SHO COMPLIANCE WERE UNREASONABLE IN DESIGN SUCH THAT THE FIRM WAS UNABLE TO DETECT THE REG SHO VIOLATIONS THAT OCCURRED. LABANT ESTABLISHED AN INEFFECTIVE PROCEDURE FOR THE REVIEW OF PROPRIETARY SHORT SALES IN ORDER TO DETERMINE WHETHER VALID LOCATES HAD BEEN OBTAINED. AMONG OTHER DEFICIENCIES, THE PROCEDURE LABANT ESTABLISHED FAILED TO REQUIRE SUPERVISORY PERSONNEL TO COMPARE THE LOCATE INFORMATION ENTERED INTO THE ORDER ENTRY SYSTEMS AGAINST RECORDS OF LOCATES GRANTED BY STOCK LOAN. THEREFORE, SUPERVISORY PERSONNEL DID NOT HAVE SUFFICIENT INFORMATION TO DETERMINE IF A LOCATE HAD BEEN OBTAINED FOR A SUFFICIENT NUMBER OF SHARES, OR HAD ACTUALLY BEEN OBTAINED AT ALL. [CONTINUED IN COMMENT]

|                                                                                                                                                             |                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| <b>Current Status:</b>                                                                                                                                      | Final                             |
| <b>Resolution:</b>                                                                                                                                          | Acceptance, Waiver & Consent(AWC) |
| <b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b> | No                                |



**Resolution Date:** 08/19/2011

**Sanctions Ordered:** Civil and Administrative Penalty(ies)/Fine(s)  
Requalification  
Suspension

**If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?** No

**(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?**

**(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or**



(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

**Sanction 1 of 1**

|                             |                          |
|-----------------------------|--------------------------|
| <b>Sanction Type:</b>       | Suspension               |
| <b>Capacities Affected:</b> | ALL PRINCIPAL CAPACITIES |
| <b>Duration:</b>            | NINE MONTHS              |
| <b>Start Date:</b>          | 09/19/2011               |
| <b>End Date:</b>            | 06/18/2012               |

**Requalification 1 of 1**

|                                           |                         |
|-------------------------------------------|-------------------------|
| <b>Requalification Type:</b>              | Requalification by Exam |
| <b>Length of time given to requalify:</b> |                         |

|                                |               |
|--------------------------------|---------------|
| <b>Type of exam required :</b> | ANY PRINCIPAL |
|--------------------------------|---------------|

|                                      |    |
|--------------------------------------|----|
| <b>Has condition been satisfied:</b> | No |
|--------------------------------------|----|

**Monetary Sanction 1 of 1**

|                                   |                                               |
|-----------------------------------|-----------------------------------------------|
| <b>Monetary Related Sanction:</b> | Civil and Administrative Penalty(ies)/Fine(s) |
|-----------------------------------|-----------------------------------------------|

|                      |             |
|----------------------|-------------|
| <b>Total Amount:</b> | \$10,000.00 |
|----------------------|-------------|

|                                           |             |
|-------------------------------------------|-------------|
| <b>Portion Levied against individual:</b> | \$10,000.00 |
|-------------------------------------------|-------------|

**Payment Plan:**

|                                 |  |
|---------------------------------|--|
| <b>Is Payment Plan Current:</b> |  |
|---------------------------------|--|

|                                 |            |
|---------------------------------|------------|
| <b>Date Paid by individual:</b> | 08/29/2011 |
|---------------------------------|------------|

|                                           |    |
|-------------------------------------------|----|
| <b>Was any portion of penalty waived?</b> | No |
|-------------------------------------------|----|

**Amount Waived:**

|                            |                                                                                                                                                                                                                                                                                                     |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Regulator Statement</b> | [CONTINUED FROM ALLEGATIONS]: HAD LABANT IMPLEMENTED A REASONABLE REVIEW, IT WOULD HAVE REVEALED THAT LOCATES HAD NOT BEEN OBTAINED AND/OR DOCUMENTED IN CONNECTION WITH A SIGNIFICANT MAJORITY OF PROPRIETARY SHORT SALES, AS WELL AS THE DEFICIENCIES IN THE STOCK LOAN DOCUMENTATION OF LOCATES. |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|



LABANT WAS AWARE THAT THE FIRM'S PROCEDURES ALSO REQUIRED THE STOCK LOAN DEPARTMENT TO REVIEW WHETHER FIRM SHORT SALES HAD BEEN EXECUTED WITHOUT LOCATES. HOWEVER, THE REPORT REVIEWED BY STOCK LOAN PERSONNEL OMITTED ALL SHORT SALES IN PROPRIETARY ACCOUNTS. AS SUCH, STOCK LOAN PERSONNEL WERE ALSO UNABLE TO DETECT PROPRIETARY SHORT SALES ENTERED WITHOUT LOCATES. AFTER BEING INFORMED OF DEFICIENCIES FOLLOWING AN EXAMINATION CONDUCTED BY THE NYSE, WHICH INCLUDED A REVIEW OF CERTAIN ASPECTS OF THE FIRM'S REG SHO COMPLIANCE, LABANT FAILED TO TAKE ADEQUATE ACTION TO IDENTIFY THEIR ROOT CAUSES. LABANT ASSUMED THAT THE PRIMARY CAUSES OF THE NYSE'S FINDINGS WAS THAT PROPRIETARY TRADERS FAILED TO REQUEST LOCATES AS REQUIRED. LABANT FAILED TO RECOGNIZE THE DEFICIENCIES IN THE FIRM'S WRITTEN POLICIES AND PROCEDURES GOVERNING THESE PRACTICES. CONSEQUENTLY, LABANT FAILED TO RECOGNIZE THAT THE REVIEW OF PROPRIETARY SHORT SALES FOR LOCATES WAS INEFFECTIVE BY DESIGN, AND/OR THAT THE STOCK LOAN DEPARTMENT WAS NOT PERFORMING A LOCATE REVIEW WITH RESPECT TO PROPRIETARY SHORT SALES. AS A RESULT, THE PROCEDURAL CHANGES THAT LABANT EFFECTED IN RESPONSE TO THE NYSE EXAMINATION WERE INADEQUATE TO REDRESS ALL OF THE UNDERLYING ISSUES THAT CAUSED THE FIRM'S VIOLATIONS. FURTHERMORE, LABANT FAILED TO ESTABLISH REASONABLE POLICIES AND PROCEDURES, OR A SYSTEM OF FOLLOW-UP AND REVIEW, TO DETERMINE THAT STOCK LOAN PERSONNEL WERE COMPLYING WITH ALL OF THE REQUIREMENTS OF REG SHO. FOR THIS REASON, THE FIRM'S COMPLIANCE DEPARTMENT WAS UNAWARE FOR MONTHS THAT STOCK LOAN HAD OBTAINED AND USED AN UNAUTHORIZED EASY-TO-BORROW LIST TO GRANT LOCATES.

WITHOUT ADMITTING OR DENYING THE FINDINGS, LABANT CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS; THEREFORE SHE IS FINED \$10,000, SUSPENDED FROM ASSOCIATION WITH ANY FINRA MEMBER IN ALL PRINCIPAL CAPACITIES FOR NINE MONTHS, AND MUST REQUALIFY AS A PRINCIPAL BEFORE FUNCTIONING IN ANY PRINCIPAL CAPACITY. THE SUSPENSION IS IN EFFECT FROM SEPTEMBER 19, 2011 THROUGH JUNE 18, 2012.

.....

|                                                                                  |                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Reporting Source:</b>                                                         | Individual                                                                                                                                                                                                                                                                                                                                                         |
| <b>Regulatory Action Initiated By:</b>                                           | FINRA                                                                                                                                                                                                                                                                                                                                                              |
| <b>Sanction(s) Sought:</b>                                                       | Other: N/A                                                                                                                                                                                                                                                                                                                                                         |
| <b>Date Initiated:</b>                                                           | 08/19/2011                                                                                                                                                                                                                                                                                                                                                         |
| <b>Docket/Case Number:</b>                                                       | <a href="#">2008013127802</a>                                                                                                                                                                                                                                                                                                                                      |
| <b>Employing firm when activity occurred which led to the regulatory action:</b> | ROBERT W. BAIRD & CO. INC.                                                                                                                                                                                                                                                                                                                                         |
| <b>Product Type:</b>                                                             | No Product                                                                                                                                                                                                                                                                                                                                                         |
| <b>Allegations:</b>                                                              | FROM JANUARY 2005 THROUGH FALL 2009 LABANT FAILED TO ESTABLISH, MAINTAIN, AND ENFORCE A REASONABLE SUPERVISORY SYSTEM, INCLUDING WRITTEN SUPERVISORY PROCEDURES, WITH RESPECT TO THE REQUIREMENTS OF REGULATION SHO. AS A RESULT, HER FIRM EXPERIENCED SYSTEMIC REGULATION SHO-RELATED OPERATIONAL AND SUPERVISORY DEFICIENCIES THAT PERSISTED THROUGHOUT THE TIME |



LABANT WAS RESPONSIBLE FOR THE FIRM'S CAPITAL MARKETS REGULATION SHO COMPLIANCE.

**Current Status:** Final

**Resolution:** Acceptance, Waiver & Consent(AWC)

**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** No

**Resolution Date:** 08/19/2011

**Sanctions Ordered:** Civil and Administrative Penalty(ies)/Fine(s)  
Requalification  
Suspension

**Sanction 1 of 1**

**Sanction Type:** Suspension

**Capacities Affected:** ALL PRINCIPAL CAPACITIES

**Duration:** NINE MONTHS

**Start Date:** 09/19/2011

**End Date:** 06/18/2012

**Requalification 1 of 1**

**Requalification Type:** Requalification by Exam

**Length of time given to requalify:**

**Type of exam required :** ANY PRINCIPAL

**Has condition been satisfied:** No

**Monetary Sanction 1 of 1**

**Monetary Related Sanction:** Civil and Administrative Penalty(ies)/Fine(s)

**Total Amount:** \$10,000.00

**Portion Levied against individual:** \$10,000.00

**Payment Plan:**

**Is Payment Plan Current:** Yes

**Date Paid by individual:** 08/26/2011

**Was any portion of penalty waived?** No

**Amount Waived:**



## End of Report

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