



IAPD Report

JACK W LUNA

CRD# 4614490

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

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

JACK W LUNA (CRD# 4614490)

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 **08/01/2018**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	OPTIMUS CAPITAL ADVISORS, LLC	CRD# 147500	05/22/2014

QUALIFICATIONS

This representative is currently registered in **0** 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
IA	OPTIMUS CAPITAL ADVISORS, LLC	147500	COPPELL, TX	01/05/2011 - 08/19/2013
IA	TITAN WEALTH MANAGEMENT, LLC	132401	PLANO, TX	04/23/2007 - 12/31/2009
B	WFG INVESTMENTS, INC.	22704	PLANO, TX	11/04/2008 - 05/27/2009

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 **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **OPTIMUS CAPITAL ADVISORS, LLC**

Main Address: 743 W. MAIN STREET
COPPELL, TX 75019

Firm ID#: 147500

	Regulator	Registration	Status	Date
IA	Texas	Investment Adviser Representative	Approved	05/22/2014

Branch Office Locations

OPTIMUS CAPITAL ADVISORS, LLC
743 W. MAIN STREET
COPPELL, TX 75019



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 0 principal/supervisory exams, 1 general industry/product exam, and 1 state securities law exam.

Principal/Supervisory Exams

Exam	Category	Date
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No information reported.

General Industry/Product Exams

Exam	Category	Date
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B General Securities Representative Examination (S7)	Series 7	01/30/2003
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State Securities Law Exams

Exam	Category	Date
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IA B Uniform Combined State Law Examination (S66)	Series 66	07/10/2003
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PROFESSIONAL DESIGNATIONS

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

No information reported.



Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	01/05/2011 - 08/19/2013	OPTIMUS CAPITAL ADVISORS, LLC	CRD# 147500	COPPELL, TX
IA	04/23/2007 - 12/31/2009	TITAN WEALTH MANAGEMENT, LLC	CRD# 132401	PLANO, TX
B	11/04/2008 - 05/27/2009	WFG INVESTMENTS, INC.	CRD# 22704	PLANO, TX
IA	10/30/2008 - 11/18/2008	WILLIAMS FINANCIAL GROUP	CRD# 22704	PLANO, TX
IA	08/13/2004 - 03/05/2007	MORGAN STANLEY	CRD# 7556	ARLINGTON, TX
B	08/13/2004 - 03/05/2007	MORGAN STANLEY DW INC.	CRD# 7556	ARLINGTON, TX
IA	07/24/2003 - 08/18/2004	MERRILL LYNCH PIERCE FENNER & SMITH INC.	CRD# 7691	IRVING, TX
B	02/03/2003 - 08/18/2004	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	NEW YORK, NY

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
05/2014 - Present	Optimus Capital Advisors, LLC	Investment Adviser Representative	Y	Grapevine, TX, 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.

MR. LUNA IS LICENSED AS AN INDEPENDENT INSURANCE AGENT AND OFFERS INSURANCE PRODUCTS TO ADVISORY CLIENTS FOR WHICH HE IS COMPENSATED IN THE FORM OF COMMISSIONS. MR.LUNA MAY SPEND APPROXIMATELY 10% OF HIS TIME IN THIS CAPACITY.



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: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Sanction(s) Sought: Cease and Desist

Date Initiated: 02/02/2011

Docket/Case Number: 3-14221

Employing firm when activity occurred which led to the regulatory action: TITAN WEALTH MANAGEMENT, LLC

Product Type: Other: MID-TERM NOTE; PONZI SCHEME

Allegations: SEC ADMIN IA RELEASE 3148, FEBRUARY 2, 2011: THE SECURITIES AND EXCHANGE COMMISSION ("COMMISSION") DEEMS IT APPROPRIATE THAT CEASE-AND-DESIST PROCEEDINGS BE INSTITUTED PURSUANT TO SECTION 203(K) OF THE INVESTMENT ADVISERS ACT OF 1940 ("ADVISERS ACT") AGAINST JACK W. LUNA ("LUNA" OR "RESPONDENT").

THE COMMISSION FOUND THAT:

IN MARCH 2007, LUNA JOINED AN INVESTMENT ADVISER REGISTERED WITH THE COMMISSION AS AN ADVISORY REPRESENTATIVE. SHORTLY THEREAFTER, THE FIRM'S OWNER INTRODUCED LUNA TO AN INVESTMENT PURPORTEDLY INVOLVING STEEPLY DISCOUNTED EUROPEAN MID-TERM NOTES ("MTNS"). THE FIRM'S OWNER TOLD LUNA THAT THE OWNER POOLED INVESTOR FUNDS TO PURCHASE EITHER AN ENTIRE MTN OR A PARTIAL INTEREST IN AN MTN. THE TERMS OF INVESTMENT VARIED, BUT THE OWNER TOLD LUNA THAT THE MTN INVESTMENT PAID SHORT TERM RETURNS RANGING FROM 10% TO 50%. THE OWNER TOLD LUNA THAT



THE FIRM DID NOT RECEIVE ANY COMPENSATION OR COMMISSIONS FROM THE PURCHASE OR SALE OF THE MTNS AND THAT THE INVESTMENTS WERE LOW RISK BECAUSE THEY INVOLVED SHORT TERM NOTES ISSUED BY ESTABLISHED EUROPEAN BANKS.

ALTHOUGH LUNA WAS INITIALLY SKEPTICAL ABOUT THE RISKS AND RETURN ON THE MTN INVESTMENT, LUNA WAS REASSURED AFTER THE OWNER SHOWED LUNA INFORMATION ON THE OWNER'S COMPUTER PURPORTEDLY REFERENCING THE MTNS. BASED ON THESE REPRESENTATIONS FROM THE OWNER, AND WITHOUT CONDUCTING ANY INDEPENDENT DUE DILIGENCE, LUNA DECIDED PERSONALLY TO INVEST, AND RECOMMENDED THAT SEVERAL OF HIS CLIENTS (INCLUDING FAMILY MEMBERS) INVEST, IN THE MTNS RECOMMENDED BY THE ADVISER FIRM.

LUNA DID NOT VERIFY HOW THE FUNDS HE AND HIS CLIENTS HAD INVESTED WERE BEING USED. AT SOME POINT, LUNA BECAME AWARE THAT MONEY WAS BEING SENT TO A COMPANY CONTROLLED BY THE OWNER, BUT LUNA DID NOT VERIFY THAT THE OWNER WAS INVESTING THE FUNDS AS HE REPRESENTED HE WOULD (AND HOW LUNA REPRESENTED TO HIS CLIENTS). ONCE HE AND HIS INITIAL CLIENTS RECEIVED THEIR PRINCIPAL AND RETURNS AS PROMISED, LUNA RECOMMENDED THE MTN INVESTMENT TO ADDITIONAL CLIENTS, REPRESENTING IT TO BE LOW RISK AND COMPARING IT TO A CERTIFICATE OF DEPOSIT.

IN JANUARY 2008, SEVERAL OF LUNA'S CLIENTS FAILED TO RECEIVE THEIR PROMISED RETURNS OF PRINCIPAL AND INTEREST. LUNA QUESTIONED THE OWNER ABOUT THESE DELAYS, AND WAS GIVEN SEVERAL EXPLANATIONS, RANGING FROM PROBLEMS WITH THE EUROPEAN BANKS BECAUSE OF THE CREDIT CRISIS TO A STORY THAT THE FUNDS WERE BEING HELD UP BY HOMELAND SECURITY. BASED ON THESE EXPLANATIONS BY THE OWNER, LUNA INFORMED CLIENTS THAT FUNDS FROM THE SALE OF THE MTNS WERE EN ROUTE, AND CONTINUED TO RECOMMEND THE INVESTMENT TO OTHER CLIENTS WITHOUT DISCLOSING PRIOR DELAYS IN THE RETURN OF PRINCIPAL AND RETURNS.

IN 2009, THE COMMISSION FILED AN EMERGENCY ACTION IN FEDERAL DISTRICT COURT AGAINST THE FIRM, ITS OWNER AND OTHERS TO HALT THE SCHEME AND PRESERVE ASSETS FOR THE BENEFIT OF INVESTORS. THE COURT ENTERED AN AGREED PRELIMINARY INJUNCTION AGAINST AND ISSUED ORDERS IMPOSING AN ASSET FREEZE, ALLOWING EXPEDITED DISCOVERY, AND DIRECTING THE DEFENDANTS AND RELIEF DEFENDANTS TO PRESERVE DOCUMENTS AND PROVIDE ACCOUNTINGS. LUNA WAS NOT A PARTY IN THIS LAWSUIT.

IN ITS COMPLAINT, THE COMMISSION ALLEGED THAT THE FIRM RAISED OVER \$3 MILLION DOLLARS FROM ITS CLIENTS FOR MTN INVESTMENTS, BUT THAT THE OWNER DID NOT POOL INVESTOR FUNDS TO PURCHASE AN MTN OR ANY INTEREST IN AN MTN. INSTEAD, THE COMMISSION ALLEGED, THE FIRM AND ITS OWNER MISAPPROPRIATED OR MISAPPLIED MILLIONS OF DOLLARS OF INVESTOR FUNDS, INCLUDING THE TRANSFER OF OVER \$1.7 MILLION TO THE NAMED RELIEF DEFENDANTS AND \$859,001 TO MAKE PONZI PAYMENTS.

LUNA CAUSED THE FIRM'S VIOLATIONS OF SECTION 206(2) OF THE ADVISERS ACT.

Current Status:

Final



Resolution:	Order
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Resolution Date:	02/02/2011
Sanctions Ordered:	Cease and Desist
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?

Regulator Statement

IN ANTICIPATION OF THE INSTITUTION OF THE PROCEEDINGS, RESPONDENT SUBMITTED AN OFFER OF SETTLEMENT ("OFFER"), WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. SOLELY FOR THE PURPOSE OF THE PROCEEDINGS AND ANY OTHER PROCEEDINGS BROUGHT BY OR ON BEHALF OF THE COMMISSION, OR TO WHICH THE COMMISSION IS A PARTY, AND WITHOUT ADMITTING OR DENYING THE FINDING, EXCEPT AS TO THE COMMISSION'S JURISDICTION OVER HIM AND THE SUBJECT MATTER OF THE PROCEEDINGS, WHICH ARE ADMITTED, RESPONDENT CONSENTED TO THE ENTRY OF THE ORDER INSTITUTING CEASE-AND-DESIST PROCEEDINGS PURSUANT TO SECTION 203(K) OF THE INVESTMENT ADVISERS ACT OF 1940, MAKING FINDINGS, AND IMPOSING A CEASE-AND-DESIST ORDER ("ORDER").

THE COMMISSION FOUND THAT LUNA CAUSED THE FIRM'S VIOLATIONS OF SECTION 206(2) OF THE ADVISERS ACT.

THE COMMISSION DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST TO IMPOSE THE SANCTION AGREED TO IN RESPONDENT LUNA'S OFFER.

PURSUANT TO SECTION 203(K) OF THE ADVISERS ACT, THE COMMISSION ORDERED THAT RESPONDENT LUNA SHALL CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATION OF SECTION 206(2) OF THE ADVISERS ACT.

Reporting Source:	Individual
Regulatory Action Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Sanction(s) Sought:	Cease and Desist
Date Initiated:	02/02/2011
Docket/Case Number:	3-14221
Employing firm when activity occurred which led to the regulatory action:	TITAN WEALTH MANAGEMENT, LLC
Product Type:	Other: MID-TERM NOTE; PONZI SCHEME

**Allegations:**

SEC ADMIN IA RELEASE 3148, FEBRUARY 2, 2011: THE SEC (COMMISSION) DEEMS IT APPROPRIATE THAT CEASE-AND-DESIST PROCEEDINGS BE INSTITUTED PURSUANT TO SECTION 203(K) OF THE INVESTMENT ADVISERS ACT OF 1940 (ADVISERS ACT) AGAINST JACK W. LUNA (LUNA OR RESPONDENT). THE COMMISSION FOUND THAT: IN MARCH 2007, LUNA JOINED AN INVESTMENT ADVISER REGISTERED WITH THE COMMISSION AS AN ADVISORY REPRESENTATIVE. SHORTLY THEREAFTER, THE FIRM'S OWNER INTRODUCED LUNA TO AN INVESTMENT PURPORTEDLY INVOLVING STEEPLY DISCOUNTED EUROPEAN MID-TERM NOTES (MTNS). THE FIRM'S OWNER TOLD LUNA THAT THE OWNER POOLED INVESTOR FUNDS TO PURCHASE EITHER THE ENTIRE MTN OR A PARTIAL INTEREST IN A MTN. THE TERMS OF INVESTMENT VARIED, BUT THE OWNER TOLD LUNA THAT THE MTN INVESTMENT PAID SHORT TERM RETURNS RANGING FROM 10% TO 50%. THE OWNER TOLD LUNA THAT THE FIRM DID NOT RECEIVE COMPENSATION OR COMMISSIONS FROM THE PURCHASE OR SALE OF THE MTNS AND THAT THE INVESTMENTS WERE LOW RISK BECAUSE THEY INVOLVED SHORT TERM NOTES ISSUED BY ESTABLISHED EUROPEAN BANKS. ALTHOUGH LUNA WAS INITIALLY SKEPTICAL ABOUT THE RISKS AND RETURNS ON THE MTN INVESTMENT, LUNA WAS REASSURED AFTER THE OWNER SHOWED LUNA INFORMATION ON THE OWNER'S COMPUTER PURPORTEDLY REFERENCING THE MTNS. BASED ON THESE REPRESENTATIONS FROM THE OWNER, AND WITHOUT CONDUCTING ANY INDEPENDENT DUE DILIGENCE, LUNA DECIDED PERSONALLY TO INVEST AND RECOMMENDED THAT SEVERAL OF HIS CLIENTS (INCLUDING FAMILY MEMBERS) INVEST IN THE MTNS RECOMMENDED BY THE ADVISER FIRM. LUNA DID NOT VERIFY THAT THE OWNER WAS INVESTING THE FUNDS AS HE REPRESENTED HE WOULD (AND HOW LUNA REPRESENTED TO HIS CLIENTS). ONCE HE AND HIS INITIAL CLIENTS RECEIVED THEIR PRINCIPAL AND RETURNS AS PROMISED, LUNA RECOMMENDED THE MTN INVESTMENT TO ADDITIONAL CLIENTS, REPRESENTING IT TO BE LOW RISK AND COMPARING IT TO A CERTIFICATE OF DEPOSIT. IN JANUARY 2008, SEVERAL OF LUNA'S CLIENTS FAILED TO RECEIVE THEIR PROMISED RETURNS OF PRINCIPAL AND INTEREST. LUNA QUESTIONED THE OWNER ABOUT THESE DELAYS AND WAS GIVEN SEVERAL EXPLANATIONS, RANGING FROM PROBLEMS WITH THE EUROPEAN BANKS BECAUSE OF THE CREDIT CRISIS STORY TO A STORY THAT THE FUNDS WERE BEING HELD UP BY HOMELAND SECURITY. BASED ON THESE EXPLANATIONS BY THE OWNER, LUNA INFORMED CLIENTS THAT FUNDS FROM THE SALE OF THE MTNS WERE ENROUTE AND CONTINUED TO RECOMMEND THE INVESTMENT TO OTHER CLIENTS WITHOUT DISCLOSING PRIOR DELAYS IN THE RETURN OF PRINCIPAL AND RETURNS. IN 2009, THE COMMISSION FILED AN EMERGENCY ACTION IN FEDERAL DISTRICT COURT AGAINST THE FIRM, ITS OWNER AND OTHERS TO HALT THE SCHEME AND PRESERVE ASSETS FOR THE BENEFIT OF INVESTORS. THE COURT ENTERED AN AGREED PRELIMINARY INJUNCTION AGAINST AND ISSUED ORDERS IMPOSING AN ASSET FREEZE, ALLOWING EXPEDITED DISCOVERY AND DIRECTING THE DEFENDANTS AND RELIEF DEFENDANTS TO PRESERVE DOCUMENTS AND ALLEGED THAT THE FIRM RAISED OVER \$3 MILLION DOLLARS FROM ITS CLIENTS FOR MTN INVESTMENTS, BUT THAT THE OWNER DID NOT POOL INVESTOR FUNDS TO PURCHASE AN MTN OR AN INTEREST IN AN MTN. INSTEAD, THE COMMISSION ALLEGED THE FIRM AND ITS OWNER MISAPPROPRIATED OR MISAPPLIED MILLIONS OF DOLLARS OF INVESTOR FUNDS, INCLUDING THE TRANSFER OF OVER \$1.7 MILLION DOLLARS TO THE NAMED RELIEF DEFENDANTS AND \$859,001 TO MAKE PONZI PAYMENTS. LUNA CAUSED THE FIRM'S VIOLATIONS OF SECTION 206(2) OF THE ADVISERS ACT.

Current Status:

Final



Resolution: Order

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? Yes

Resolution Date: 02/02/2011

Sanctions Ordered: Cease and Desist

Broker Statement IN ANTICIPATION OF THE INSTITUTION OF THE PROCEEDINGS, RESPONDENT SUBMITTED AN OFFER OF SETTLEMENT (OFFER) WHICH THE COMMISSION HAS DETERMINED TO ACCEPT. SOLELY FOR THE PURPOSE OF THE PROCEEDINGS AND ANY OTHER PROCEEDINGS BROUGHT BY OR ON BEHALF OF THE COMMISSION OR TO WHICH THE COMMISSION IS A PARTY AND WITHOUT ADMITTING OR DENYING THE FINDING, EXCEPT AS TO THE COMMISSION'S JURISDICTION OVER HIM AND THE SUBJECT MATTER OF THE PROCEEDINGS, WHICH ARE ADMITTED, RESPONDENT CONSENTED TO THE ENTRY OF THE ORDER INSTITUTING CEASE-AND-DESIST PROCEEDINGS PURSUANT TO SECTION 203(K) OF THE ADVISERS ACT OF 1940, MAKING FINDINGS AND IMPOSING A CEASE-AND-DESIST ORDER (ORDER). THE COMMISSION FOUND THAT LUNA CAUSED THE FIRM'S VIOLATIONS OF SECTION 206(2) OF THE ADVISERS ACT, THE COMMISSION DEEMS IT APPROPRIATE AND IN THE PUBLIC INTEREST TO IMPOSE THE SANCTION AGREED TO IN RESPONDENT LUNA'S OFFER. PURSUANT TO SECTION 203(K) OF THE ADVISERS ACT, THE COMMISSION ORDERED THAT RESPONDENT LUNA SHALL CEASE AND DESIST FROM COMMITTING OR CAUSING ANY VIOLATIONS AND ANY FUTURE VIOLATION OF SECTION 206(2) OF THE ADVISERS ACT.



End of Report

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