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IN THE MATTER OF
THE AGENT AND INVESTMENT
ADVISER REPRESENTATIVE
REGISTRATIONS OF
STANLEY EARNEST PYNDUS, JR.

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§

Order No. IC08-SUS-09

TO: Stanley Earnest Pyndus, Jr. (CRD No. 803186)
Evolve Securities, Inc.
5300 Bee Caves Road
Building 3, Suite 100
Austin, TX 78746

DISCIPLINARY ORDER

Be it remembered that Stanley Earnest Pyndus, Jr. ("Respondent"), appeared before the Securities Commissioner of the State of Texas ("Securities Commissioner") and consented to the entry of this order ("Order") and the Findings of Fact and Conclusions of Law contained herein.

FINDINGS OF FACT

- Respondent has waived (a) Respondent's right to notice and hearing in this matter; (b) Respondent's right to appear and present evidence in this matter; (c) Respondent's right to appeal this Order; and (d) all other procedural rights granted to the Respondent by The Securities Act, TEX. REV. CIV. STAT. ANN. art. 581-1 et seq. (Vernon 1964 & Supp. 2007)("Texas Securities Act"), and the Administrative Procedure Act, TEX. GOV'T CODE ANN. § 2001.001 et seq. (Vernon 2000 & Supp. 2007)("Administrative Procedure Act").
- On or about June 4, 1991, Respondent registered with the Securities Commissioner as an agent and investment adviser representative of Morgan Stanley & Co., Inc. (formerly known as Morgan Stanley DW, Inc.)("Morgan Stanley") These registrations are currently effective.
- On or about July 3, 2008, Respondent submitted an application for registration as an agent and investment adviser representative of Evolve Securities, Inc. This application is currently pending.

4. On or about June 25, 2001, Respondent submitted a form titled "Outside Activity Approval Request Form" to Morgan Stanley in order to request Morgan Stanley's approval for Respondent's participation in an outside business activity.
5. On the Outside Activity Approval Request Form, Respondent listed the outside activity as an investment partnership under the name QRP Partners, LP ("QRP"), and identified himself as a "Founding Partner and Special Limited Partner" that was going to serve in an "Advisory Position".
6. By July 6, 2001, QRP had amended its name to Enhanced Capital Partners I, L.P. ("ECP")
7. On or about July 24, 2001, Respondent's Branch Manager and the Morgan Stanley Compliance Department approved Respondent's outside business activity request.
8. On or about July 24, 2001, Morgan Stanley's Compliance Department issued a memorandum in connection with the approval of Respondent's business activity which in part informed Respondent that he: (1) must advise the Compliance Department immediately if QRP offers securities (public or non-public) and (2) could not actively solicit Morgan Stanley clients for any QRP purposes. [The July 24, 2001 approval memorandum referenced QRP instead of ECP because Morgan Stanley was not aware of the name change.]
9. From on or about July 11, 2001 to on or about November 2, 2001, Respondent recommended and sold limited partnership interests in ECP to Texas investors.
10. The limited partnership interests in ECP were not approved or otherwise sponsored by Morgan Stanley.
11. Pursuant to Morgan Stanley's procedures, Respondent was prohibited from representing an investment that was not approved by Morgan Stanley to anyone. Respondent could only recommend products and securities that were approved by Morgan Stanley.

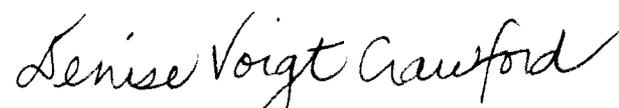
CONCLUSIONS OF LAW

1. The limited partnership interests in ECP constitute "securities" as the term "securities" is defined by Section 4.A of the Texas Securities Act.
2. Respondent's recommendations and sales of the limited partnership interests in ECP to Texas investors in violation of his employer's written supervisory procedures constitute inequitable practices in the sale of securities, and are bases for the suspension of Respondent's registrations with the Securities Commissioner pursuant to Section 14.A(3) of the Texas Securities Act.

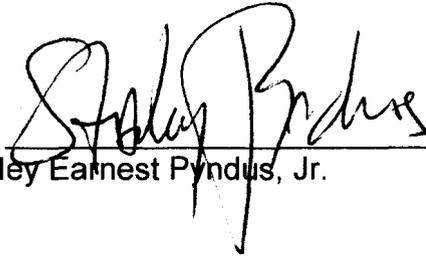
ORDER

1. It is therefore ORDERED that the application for registration of Stanley Earnest Pyndus, Jr. with the Securities Commissioner as an agent and investment adviser representative of Evolve Securities, Inc. is hereby approved.
2. It is further ORDERED that the registrations of Stanley Earnest Pyndus, Jr. with the Securities Commissioner are hereby SUSPENDED for a period of six (6) months from the date that this Order is entered.
3. It is further ORDERED that Stanley Earnest Pyndus, Jr. comply with the terms of an Undertaking with the Securities Commissioner as incorporated by reference herein.

SIGNED AND ENTERED BY THE SECURITIES COMMISSIONER this 12th
day of August, 2008.


DENISE VOIGT CRAWFORD
Securities Commissioner

Respondent:



Stanley Earnest Pyndus, Jr.

Approved as to Form:



Benette L. Zivley
Director
Inspections and Compliance Division

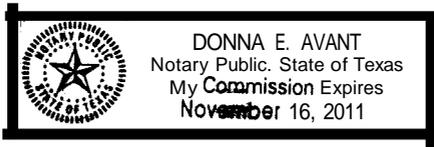


Ronak V. Patel
Attorney
Inspections and Compliance Division

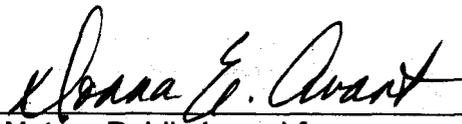
ACKNOWLEDGMENT

On the 1st day of August, 2008, Stanley Earnest Pyndus, Jr. ("Respondent") personally appeared **before** me, executed the foregoing Order, and acknowledged that:

1. Respondent has read the foregoing Order;
2. Respondent has been fully advised of his rights under the Texas Securities Act and the Administrative Procedure Act;
3. Respondent knowingly and voluntarily consents to the entry of the foregoing Order and the Findings of Fact and Conclusions of Law contained therein; and
4. Respondent, by consenting to the entry of the foregoing Order, has knowingly and voluntarily waived his rights as set forth therein.



[affix notary seal here]



Notary Public in and for
the State of TEXAS

My commission expires on: 11-16-2011