Disciplinary and Other FINRA Actions

Firms Fined

Newbridge Securities Corporation (CRD #104065, Boca Raton, Florida)
September 5, 2024 – A Letter of Acceptance, Waiver and Consent (AWC) was issued in which the firm was censured, fined $125,000, and ordered to pay $43,457.66, plus interest, in restitution to customers. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that its anti-money laundering (AML) program was not reasonably designed to achieve compliance with Customer Identification Program (CIP) and Customer Due Diligence (CDD) requirements. The findings stated that the firm's CIP procedures were not reasonably designed to address the higher identity verification risk posed by customers. The firm's CIP procedures did not specify when and under what circumstances the firm was required to use documents, non-documentary methods, or a combination of both to verify customers' identities and failed to explain when non-documentary verification methods must be performed. The firm's CDD procedures were not reasonably designed to enable the firm to understand the nature and purpose of new customer relationships for the purpose of developing a customer risk profile. The procedures failed to define when the firm would deem an account to be "higher risk," who would make that determination, and how that determination would be documented. The procedures also failed to state when financial statements, banking references or other supporting documents or information should be obtained as part of the CDD process. Furthermore, the firm's CDD procedures did not require the firm to identify and verify the identity of the beneficial owners of legal entity customers, and instead stated that the firm "may" obtain information concerning beneficial owners only for "higher risk" accounts. In addition, the firm failed to comply with CIP and CDD requirements when it opened new accounts for individual customers and legal entity customers referred by a China-based issuer for the purpose of opening new accounts and investing in the issuer's anticipated small capitalization Initial Public Offering (IPO). During the new account opening process for these customers, a representative of the issuer handled almost all communications with the firm regarding the account opening and funding process. The firm's representatives never met any of the customers face-to-face. For each customer, the issuer provided the firm with photocopies of unexpired government-issued identification evidencing nationality and residence and bearing a photograph. In addition, the firm conducted background checks on the customers using third-party vendors. These steps were not reasonable, however, given the heightened risks presented by these customers and multiple indicators that the firm did not have a reasonable belief that it knew the true identity of the customers. Despite the indicators,

Reported for November 2024

FINRA has taken disciplinary actions against the following firms and individuals for violations of FINRA rules; federal securities laws, rules and regulations; and the rules of the Municipal Securities Rulemaking Board (MSRB).

Search for FINRA Disciplinary Actions

All formal disciplinary actions are made available through a publicly accessible online search tool called FINRA Disciplinary Actions Online shortly after they are finalized.

Visit **www.finra.org/disciplinaryactions** to search for cases using key words or phrases, specified date ranges or other criteria.

the firm failed to take reasonable steps to verify the customers' true identities or conduct ongoing customer due diligence. The firm's CIP and CDD failures allowed the customers to open and maintain accounts in the face of ample information that raised concerns that the customers were not bona fide and were controlled by the issuer. The firm's AML compliance officer (AMLCO) believed these accounts posed "higher risk," but the AMLCO failed to document any such determination and also failed to inform other firm supervisors with AML responsibilities of any such determination. After its clearing firm raised questions and concerns about the customers, the firm declined to serve as underwriter for the offering, and the IPO did not proceed. The findings also stated that the firm failed to reasonably supervise recommendations to purchase variable rate structured products (VRSPs). Firm representatives located in a branch office of the firm made unsuitable recommendations that customers with either low or moderate risk tolerances purchase VRSPs. Collectively, the customers suffered realized losses of $23,908.21, even after accounting for income earned while they held the VRSPs. In addition, Representatives located in that branch office of the firm unsuitably recommended that other customers concentrated their accounts in VRSPs. Each customer held positions in VRSPs that were equal to at least 25 percent of their liquid net worth as a result of those recommendations. Collectively, those customers paid $19,549.45 in sales charges for unsuitable VRSP purchases but did not suffer any realized losses. (**FINRA Case #2020067800801**)

Odeon Capital Group LLC (CRD #148493, New York, New York)
September 6, 2024 – An AWC was issued in which the firm was censured and fined $250,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish, maintain, and enforce a supervisory system, including written supervisory procedures (WSPs), reasonably designed to achieve compliance with FINRA Rule 5121's provisions relating to qualified independent underwriters (QIUs). The findings stated that the firm was retained by a FINRA member firm with a conflict of interest to serve as the QIU for six public offerings of special purpose acquisition companies (SPACs). Prior to this time, the firm had not previously served as a QIU. For five of those public offerings, the firm limited its work to reviewing the Form S-1 registration statement and performed no other inquiry with respect to the due diligence investigation conducted by the counsel that was selected and retained by the other firm. The firm's WSPs did not discuss FINRA Rule 5121 or the requirement that the firm participate in the preparation of the offering documents and exercise the usual standards of due diligence with respect to the issuer's representations in the offering documents. The firm's WSPs also did not discuss SPACs, or the risks associated with their offerings. The firm also did not establish any supervisory system or review to monitor its compliance with FINRA Rule 5121. Eventually, the firm implemented WSPs relating to the qualification requirements for a QIU and later it implemented WSPs relating to the participation and due diligence requirements set forth in FINRA Rule 5121(a)(1) and (a)(2). (**FINRA Case #2021071695501**)

J.P. Morgan Securities LLC (CRD #79, New York, New York)
September 9, 2024 – An AWC was issued in which the firm was censured, fined $190,000, and required to certify that it has remediated the issues identified in the AWC and implemented a reasonably designed supervisory system. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it permitted individuals in its U.S. Investment and Corporate Banking Group (ICB) to perform investment banking activities requiring registration during periods when they were not registered with FINRA. The findings stated that each of the unregistered persons was previously registered as an Investment Banking Representative within two years of the date the firm hired them, and therefore did not need to take and pass a qualification examination before becoming registered through the firm. The period between when the unregistered persons' employment at the firm began and when they registered with FINRA through submission of a Uniform Application for Securities Industry Registration or Transfer (Form U4) ranged from 68 to 196 days. During the periods when they were not registered, the unregistered persons worked as part of investment banking deal teams and engaged in activities requiring registration, such as advising clients on securities offerings or drafting marketing materials for offerings. The findings also stated that the firm's supervisory system was not reasonably designed to comply with FINRA registration requirements. The firm generated a quarterly report for designated supervisors in ICB to certify that the employees they supervised were properly registered. However, the firm's supervisory report unreasonably failed to include employees on whose behalf the firm had not filed a Form U4, such as the unregistered persons. Moreover, there were no controls in place to block unregistered individuals from being added to investment banking deal teams or accessing deal information in the firm's systems. The firm was aware that the unregistered persons did not have approved Form U4s and had sent them and/or their supervisors emails alerting them to that fact, yet it still permitted them to be added to deal teams and perform investment banking activities requiring registration. The firm has since taken steps to enhance its supervisory system, including by enhancing its processes and implementing a new control to prevent unregistered employees from being added to investment banking deal teams or accessing deal information in the firm's systems.
(**FINRA Case #2021069334401**)

Wells Fargo Clearing Services, LLC (CRD #19616, St. Louis, Missouri)
September 12, 2024 – An AWC was issued in which the firm was censured, fined $400,000, ordered to pay $599,025.29, plus interest, in restitution to customers, and ordered to pay disgorgement of concessions received in the amount of $2,031,972.10, plus interest, Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to reasonably supervise a registered representative who recommended unsuitable, short-term trading of syndicate products to retail customers. The findings stated that the representative recommended purchases of syndicate preferred stock, closed-end

funds (CEFs), and medium-term notes (MTNs) to his customers, then recommended the customers sell the positions for a loss, even after including income generated from the investments, after holding the positions for a short-term (180 days or less). On multiple occasions, the representative recommended the purchase of another syndicate preferred stock or CEF soon after the sale of the first preferred stock or CEF, earning another sales concession. The firm's automatic surveillance system, used to identify short-term trading in syndicate preferred stock, CEFs, and MTNs, did not detect these transactions because it was not designed to generate alerts for liquidations of these securities that occurred more than 90 days after purchase. When the firm did flag the representative's short-term trades of syndicate preferred stock, CEFs, and MTNs through electronic and manual reviews, the firm notified the representative of the questionable nature of the trade's suitability yet failed to reasonably follow up and address with the representative these red flags of unsuitable trading. For each of the products at issue, the firm was a member of the selling syndicate. Thus, when firm customers purchased these products, the issuer paid the firm a sales concession, a portion of which the firm shared with the representatives. In addition, where customers later sold these securities, the firm typically, but not always, charged customers sales commissions, which it also shared with the representatives. As a result, the firm earned approximately $578,023 in selling concessions from the syndicate purchases and approximately $282,564 in sales commissions from the subsequent sales. The findings also stated that the firm failed to establish and maintain a supervisory system reasonably designed to achieve compliance with its suitability obligations for syndicate preferred stock and CEFs. The firm's procedures did not explain what constituted short-term trading or explicitly set forth the duration of an appropriate holding period. The firm identified liquidations of syndicate preferred stock and CEFs within 90 days of purchase through an automatic alert system that generated daily Syndicate Short-Term Hold alerts. In addition, Short-term trading greater than 90 days was not subject to any automated supervisory alert. Even where short-term trades held less than 90 days were flagged by the automatic alert system, the firm did not take reasonable action to follow-up and investigate potentially unsuitable trades. At least 40 representatives, other than the representative previously described, recommended 1,504 syndicated preferred stock and CEF purchases where these positions were then sold with a holding period of 180 days or less where there was a realized loss on the solicited sale even after including income earned on the position. For these positions, the firm earned approximately $1,453,948 in selling concessions from the syndicate purchases, and approximately $316,460 in sales commissions from the subsequent sales. The firm has implemented an improved trade review system and written procedures to provide for enhanced supervisory review of short-term trades of syndicate preferred stocks, CEFs, and MTNs. (**FINRA Case #2019061442702**)

Securities Research, Inc. of Florida (CRD #6516, Vero Beach, Florida)
September 13, 2024 – An AWC was issued in which the firm was censured, fined $60,000, ordered to pay $49,253.72, plus interest, in restitution to customers, and required to certify that it has remediated the issues identified in the AWC and implemented reasonably designed written policies and procedures, and a supervisory system, including WSPs. The restitution order reflects excess sales charges and fees incurred by four customers to whom the firm has not yet paid full restitution. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and maintain a system reasonably designed to supervise short-term Class A mutual fund switching, and it failed to supervise switches effected by a registered representative in senior customer accounts. The findings stated that the firm's procedures failed to describe the steps that supervisors must take when conducting monthly reviews of short-term mutual fund switches, and the firm failed to establish a system reasonably designed to determine whether short-term mutual fund switches were suitable and in the customer's best interest. The firm has not used tools offered by its clearing firm or any reasonable alternative designed to achieve compliance with FINRA Rule 2111 and the Care Obligation of Rule 15l-1 (Reg BI) of the Securities Exchange Act of 1934 (Exchange Act) in connection with short-term switches. Instead, the firm has relied on its supervisors' manual review of a monthly report of mutual fund transactions. This report, however, has omitted the information necessary to identify whether a transaction constitutes a short-term sale, such as the date that the mutual fund was purchased. Although the firm's supervisors sometimes manually researched this information, they did not do so consistently, and the firm's WSPs did not require that they do so. In addition, the firm's written policies and procedures requiring registered representatives to consider reasonably available alternatives when making recommendations to retail customers did not detail the steps that they must take to comply with the requirement when recommending mutual fund switches. Nor have the firm's WSPs described what supervisors must do to review representatives' consideration of reasonably available alternatives. As a result of these supervisory deficiencies, the firm failed to take reasonable steps to review the representative's recommendations of short-term switches of mutual funds. The representative's recommendations were unsuitable or not in the best interest of the customers. The firm manually flagged some of the short-term switches that the representative effected in the customers' accounts, but it largely confined its supervisory review to confirming that the customers had approved them. The firm did not assess whether the representative exercised reasonable diligence in recommending the transactions, either before or after the transactions took place. Further, for a few of the transactions, the firm did not review whether the representative exercised reasonable diligence, care, and skill to consider reasonably available alternatives, including mutual fund share classes in the same fund family as the customers' existing holdings, or different mutual fund share classes, that may

have achieved the customers' objectives at a lower cost. The firm failed to assess whether the transactions were suitable for or in the best interest of the customers, who collectively paid $43,724.87 in excessive sales charges. The findings also stated that the firm failed to establish, maintain, and enforce a system, including written procedures, reasonably designed to supervise the application of: (1) sales charge waivers to which customers are entitled through exchange privileges offered by mutual fund companies; and (2) sales charge waivers and fee rebates to which customers are entitled through rights of reinstatement offered by mutual fund companies. As a result, customers paid $51,600.42 in excess sales charges and fees relating to mutual fund exchanges. (**FINRA Case #2021069353202**)

Carolina Financial Securities, LLC (CRD #41970, Brevard, North Carolina)
September 16, 2024 – An AWC was issued in which the firm was censured, fined $20,000, and required to certify that it has remediated the issues identified in the AWC and implemented a reasonably designed supervisory system, including WSPs. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it willfully violated Section 10(b) of the Exchange Act and Rule 10b-9 promulgated thereunder by failing to terminate a contingency offering upon a material change to its terms. The findings stated that the firm served as the placement agent for the contingency offering, which required the issuer to raise a minimum of $1 million by July 15, 2021. The private placement memorandum stated that the funds would be used to purchase a holding company and its assets. By June 30, 2021, the issuer had raised less than $1 million. The firm then sent investors an email stating that the entity and its assets could be purchased at a lower price and requested that investors sign subscription confirmation agreements agreeing to modify the minimum offering amount to $900,000 or less if the acquisition price of the assets were further reduced. Each investor signed the subscription confirmation agreement. This reduction in the minimum contingency was a change to a material term of the offering that required that the offering be terminated, and investor funds be returned. Instead, the firm released $882,025 in investor funds from the escrow account to the issuer. The findings also stated that the firm's supervisory system, including WSPs, were not reasonably designed to achieve compliance with Exchange Act Rule 10b-9. The firm had no procedures or system to address the firm's obligations if the minimum contingency was not met by the offering's termination date, the termination date was extended, or other material changes were made to the offering terms, including a lowering of the minimum contingency amount. Moreover, the firm did not designate anyone with responsibility for supervising contingency offerings. (**FINRA Case #2021072848301**)

Colorado Financial Service Corporation (CRD #104343, Centennial, Colorado)
September 16, 2024 – An AWC was issued in which the firm was censured, fined $50,000, and required to certify that it has remediated the issues identified in the AWC and implemented a reasonably designed AML program. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that its AML procedures were not reasonably designed to detect and report suspicious transactions, including potentially manipulative activity such as prearranged trading. The findings stated that although the firm's AML procedures stated that the firm would manually monitor a sufficient amount of account activity to permit identification of patterns of unusual size, volume, pattern or type of transactions, the procedures did not identify the frequency of such monitoring, what constituted a "sufficient amount" of activity to review, or what activity the firm considered to be suspicious or unusual. The AML procedures also stated that the firm would use exception reports that included transaction size, location, type, number, and nature of the activity. But the procedures did not identify any specific reports or monitoring parameters, and, in practice, the firm did not use any exception report designed to monitor for suspicious activity. Instead, the firm relied exclusively on a daily manual review of its trade blotter to monitor for suspicious trading activity. The blotter, however, did not contain sufficient information to allow a reviewer to identify suspicious transactions, including order entry time, market trading volume, patterns of trading across accounts or multiple days, or potentially prearranged trading between accounts. Furthermore, the firm failed to detect or investigate red flags of suspicious trading in a low-priced, thinly traded security. For example, the firm failed to detect multiple instances where two customers executed corresponding buy and sell orders in a security in equal share amounts at the same price, and one instance where the same two customers placed corresponding buy and sell orders for shares of the security at an identical price within two minutes of one another. The firm also failed to detect instances where trading activity by the same two customers accounted for up to 85 percent of the total daily market trading volume in the security. Moreover, even when the firm's clearing firm raised concerns about the same two customers' trading activity in the security, the firm failed to take any reasonable steps to investigate. (**FINRA Case #2020066831101**)

Pershing LLC (CRD #7560, Jersey City, New Jersey)
September 16, 2024 – An AWC was issued in which the firm was censured and fined $150,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to report the Non-Transaction Based Compensation (NTBC) indicator for certain transactions in municipal securities. The findings stated that the firm's electronic system for reporting transactions failed to account for the fact that it did not accept compensation for transactions with two affiliates. Thus, the firm erroneously reported the affiliate transactions without the applicable NTBC indicator. The findings also stated

that the firm failed to report the No Remuneration (NR) indicator to the Trade Reporting and Compliance Engine (TRACE) for certain transactions in TRACE-eligible securities that did not include a commission, mark-up, or mark-down because its reporting logic failed to account for transactions with affiliates where the firm did not charge transaction-based compensation. The findings also included that the firm's supervisory system was not reasonably designed to ensure compliance with the requirements of Municipal Securities Rulemaking Board (MSRB) Rule G-14(b). The firm lacked supervisory reviews and written procedures for checking whether the firm accurately reported the NTBC indicator. The firm has since addressed this issue when its personnel began reviewing randomly selected trades on a monthly basis to confirm whether the firm correctly appended the NTBC indicator in reports to the Real-time Transaction Reporting System (RTRS). FINRA found that the firm's supervisory system was not reasonably designed to achieve compliance with the requirements of FINRA Rule 6730(d). The firm's written procedures provided for certain supervisory reviews of its TRACE reporting, none related to the accurate reporting of the NR indicator. The firm addressed this issue when it began performing monthly reviews of a random sample of TRACE-eligible securities transactions for the accuracy of the reported NR indicator. Both review processes are memorialized in the firm's WSPs. (**FINRA Case #2020066661101**)

Dalmore Group LLC (CRD #136352, Woodmere, New York)
September 17, 2024 – An AWC was issued in which the firm was censured, fined $375,000, and required to certify that it has remediated the issues identified in the AWC and implemented a reasonably designed supervisory system, including WSPs. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and maintain a supervisory system, including WSPs, reasonably designed to achieve compliance with its suitability and best interest obligations in connection with its sale of private placements. The findings stated that although the firm asked issuers to complete a checklist of items for investigation, for some offerings, it had no checklist or other record of any investigation having been conducted, had a checklist that was missing information, or had a checklist completed by the issuer without any record of a supervisory review having been conducted by the firm. The firms WSPs did not reference Reg BI until eight months after it took effect. The firm's WSPs provided only general information about its obligations under Reg BI, without tailoring that guidance to its business. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to prevent the misuse of material, non-public information. The firm's WSPs did not provide clear guidance on whether to distribute the firm's restricted list to its registered representatives, the firm did not regularly distribute the restricted list to representatives and had no other method of identifying for representatives the securities that were restricted; and when it began regularly distributing its restricted list, the firm failed to regularly update the list to make it current. The findings also included that the firm failed to fingerprint

non-registered associated persons who were not exempt from fingerprinting requirements. FINRA found that the firm failed to report outside business activities (OBAs) of six representatives on their Forms U4, and untimely updated the Forms U4 of four other representatives to disclose OBAs between two and nine months late. All of the OBAs were disclosed to the firm at or around the time the representatives registered with FINRA through an association with the firm. FINRA also found that the firm violated FINRA's standards for communications with the public on websites and in a web-based video series that all featured securities offerings with the firm as broker-dealer of record. These websites and video series included statements that were either unwarranted, exaggerated, and/or promissory regarding investments. In addition, FINRA found that the firm willfully violated Section 10(b) of the Exchange Act and Exchange Act Rule 10b-9 by failing to state a date by which a private placement offering's minimum raise contingency had to be met, and approving investments for closure before the contingency was met. The firm participated in a private offering for a start-up seeking to acquire and operate certain franchises, with a minimum offering contingency. The private placement memorandum for this offering stated that there would be a minimum and a maximum raise, with an initial closing when the issuer has commitments for the minimum offering amount, followed by additional closings on a rolling basis. The firm failed to specify an actual date by which the minimum contingency had to be met and also approved over 50 individual investments totaling approximately $3 million for disbursement to the issuer, on a rolling basis, while falling $2 million or more short of the contingency. Moreover, FINRA found that the firm failed to provide timely, complete, and accurate responses to requests for documents and information. The requests sought substantially similar documents and information about what roles and responsibilities certain foreign non-registered associated persons performed at the firm. In response, the firm: (i) omitted some individuals entirely; (ii) vaguely described the responsibilities of over two dozen individuals as "coordinates email requests" while omitting that certain individuals had managerial responsibilities and could access the firm's original books and records; and (iii) provided inaccurate titles such as administrative assistant, support lead, or operations lead, when the same persons held themselves out, including in firm email and on-line profiles, as Vice President, Director, and a Department Head of Regulation A Trading. The firm supplemented its responses only after repeated communications from FINRA questioning the completeness of prior responses. (**FINRA Case #2021069395701**)

TradeUP Securities, Inc. (CRD #18483, New York, New York)
September 18, 2024 – An AWC was issued in which the firm was censured and fined $300,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to report to FINRA its short interest positions. The findings stated that in July 2021, the firm began to self-clear customer short sales. However, the firm did not begin reporting its short interest to

FINRA until May 2023 after receiving an inquiry from FINRA. The firm had been under the mistaken belief that its third-party back-office vendor was reporting its short interest to FINRA on the firm's behalf. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to achieve compliance with its short interest reporting obligations. The firm did not have any procedures in place to confirm that its short interest data was reported to FINRA. In addition, the firm's WSPs did not address its obligation to report short position data to FINRA under FINRA Rule 4560. Ultimately, the firm implemented procedures designed to ensure the accuracy and timely submission of short interest reporting to FINRA and amended its WSPs to address its short interest reporting requirements. (**FINRA Case #2023077924101**)

Wedbush Securities Inc. (CRD #877, Los Angeles, California)
September 18, 2024 – An AWC was issued in which the firm was censured, fined $50,000, and ordered to pay $77,736.33, plus interest, in restitution to customers. The amount of restitution is equal to: (i) the realized losses suffered by customers in variable rate structured products (VRSPs), accounting for income, for the customers for whom recommendations of VRSPs were unsuitable, and (ii) sales charges that the firm received in connection with the customers' purchases of VRSPs, for the customers with unsuitable concentration levels. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to reasonably supervise recommendations to purchase VRSPs made to customers. The findings stated that the firm's representatives recommended that customers with either low or moderate risk tolerances purchase VRSPs. Such recommendations were unsuitable for these customers in light of the substantial risks of VRSPs. The firm did not obtain disclosure forms from these customers and did not otherwise take steps reasonably designed to supervise whether recommendations to purchase VRSPs were consistent with customers' investment profiles. Collectively, these customers suffered realized losses of $34,576.33, after accounting for income earned while they held the VRSPs. The findings also stated that the firm's representatives unsuitably recommended that other customers invest in VRSPs at levels that resulted in unsuitable concentration. Each customer held positions in VRSPs that were equal to at least 25 percent of his or her liquid net worth as a result of these recommendations. Because VRSPs can potentially earn little or zero interest for years and subject customers to a risk of loss of principal, such concentrated positions were unsuitable. The firm did not have any exception report or other supervisory process concerning concentration in structured products and did not otherwise conduct reasonable supervisory reviews to evaluate whether the VRSP recommendations and concentration levels were suitable for these customers. Collectively, these customers paid $43,160.00 in sales charges for VRSP purchases but did not suffer realized losses. Ultimately, the firm established revised WSPs and additional supervisory controls concerning structured products. (**FINRA Case #2023077658401**)

Wedbush Securities Inc. (CRD #877, Los Angeles, California)
September 19, 2024 – An AWC was issued in which the firm was censured and fined $425,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to comply with Rule 606 of Regulation NMS of the Exchange Act. The findings stated that the firm published Rule 606 reports that excluded equity and options orders in NMS securities due to data integrity issues. As a result, the reports also contained inaccurate percentages of the firm's non-directed equity and options orders. The firm also published Rule 606 reports that did not provide an accurate list of the firm's execution venues for options orders and omitted other required information concerning those execution venues. Specifically, the reports misidentified one broker-dealer as an execution venue. The reports also failed to disclose material aspects of the firm's relationships with any of its execution venues, including payment for order flow arrangements. Furthermore, the firm failed to make its Rule 606 reports available within one month after the end of the preceding quarter. The firm has since remediated the identified data integrity issues and has been timely in making its Rule 606 reports available. In addition, the firm failed to notify customers in writing, on at least an annual basis, of information available to them in Rule 606 reports. The findings also stated that the firm published monthly reports regarding its execution of covered orders that contained inaccurate order data or were not timely published. In the firm's capacity as a market center, it received covered orders reportable under Rule 605. The firm published monthly Rule 605 reports that did not report statistical information on those covered orders and instead inaccurately stated the firm had zero covered orders. After discovering the reporting inaccuracies, the firm republished its monthly Rule 605 reports for that period. However, these reports were also inaccurate because they included hundreds of orders not covered under Rule 605 because the orders were subject to special order handling instructions. The findings also included that the firm failed to establish, maintain, and enforce a supervisory system reasonably designed to achieve compliance with Rules 605 and 606 of Regulation NMS. The firm did not have any system in place to supervise its Rule 606 reports or the third-party vendors it used to prepare those reports. The firm also had no processes or procedures to review the accuracy of order data or other information contained in the Rule 606 reports. In addition, the firm failed to update its Rule 606 WSPs to address the Securities and Exchange Commission's (SEC) 2018 regulations that require more detailed disclosures, particularly regarding payments per order, until almost two years after they went into effect. The firm then revised its WSPs to address the SEC's amended regulations and require, among other things, the firm to review the accuracy of its Rule 606 reports. Separately, the firm failed to perform any supervisory reviews to verify the accuracy of the firm's Rule 605 reporting.
(**FINRA Case #2021069504101**)

BofA Securities, Inc. (CRD #283942, New York, New York) and Merrill Lynch, Pierce, Fenner & Smith Incorporated (CRD #7691, New York, New York)
September 23, 2024 – An AWC was issued in which the firms were censured, BofA Securities was fined $60,000, and Merrill Lynch was fined $215,000. Without admitting or denying the findings, the firms consented to the sanctions and to the entry of findings that they failed to timely file amendments for their registered representatives' Forms U4 to update the representatives' OBAs and to reflect changes in the representatives' business addresses. The findings stated that the firms discovered that they had failed to timely file Form U4 amendments and they began and later completed filing the late amendments. The findings also stated that the firms failed to establish and maintain a supervisory system reasonably designed to achieve compliance with the firm's obligation to timely file Forms U4 amendments. The firms share common supervisory systems and procedures relating to the filing of Form U4 amendments and did not have any system in place to verify that such amendments were timely filed. (**FINRA Case #2023078116101**)

Independent Financial Group, LLC (CRD #7717, San Diego, California)
September 23, 2024 – An AWC was issued in which the firm was censured, fined $500,000, and required to certify that it has remediated the issues identified in the AWC and implemented a reasonably designed supervisory system, including WSPs. All customers have already either received restitution or are expected to receive full restitution through a separate agreement. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish, maintain, and enforce a supervisory system reasonably designed to supervise excessive trading and assure compliance with Reg BI, and failed to reasonably supervise a registered representative who excessively traded five customers' accounts, most of whom were elderly. The findings stated that the firm's WSPs made compliance staff, who were not responsible for supervising registered representatives, responsible for reviewing an Excessive Trading Report available through the firm's clearing firm. However, instead of reviewing the Excessive Trading Report, the firm's compliance staff reviewed an internal excessive trade alert, which suffered from certain deficiencies of which the firm was unaware. In addition, the firm's procedures failed to provide reasonable guidance about how compliance personnel should conduct review of excessive trade alerts or when they should take action based upon the information contained in those alerts, and the firm did not include guidance on the use of cost-to-equity ratios or guidance on what turnover rates could signal excessive trading. When the firm's compliance staff reviewed excessive trade alerts, they frequently closed them without conducting further investigation into whether the trading was consistent with the customer's best interest. he firm's WSPs also contained a provision making supervisory staff responsible for identifying potential excessive trading through their overall review of client transactions appearing on trade blotters and trade-by-trade alerts. A

senior supervisor at the firm, however, instructed supervisory personnel to assess each alert only as it pertained to the specific trade generating the alert. The firm failed to provide the firm's supervisory staff with procedures, tools, or training to identify potential excessive trading by assessing a series of transactions. The firm provided no guidance to supervisors regarding what factors might suggest that a representative was excessively trading an account or what steps they should take if they identified potential excessive trading. The findings also stated that the firm failed to reasonably respond to red flags of excessive trading by the representative. The representative excessively traded the customers' accounts, directing frequent in-and-out trading and causing a level of trading that was inconsistent with the customers' investment profiles and that was not in their best interest or was not suitable. Collectively, these customers paid more than $2.2 million in total trading costs and incurred realized losses totaling approximately $2.2 million, inclusive of commissions. The findings also included that the firm failed to timely and completely respond to FINRA's requests for documents and information. FINRA sent the firm a request for, among other things, documentation of its supervisory review of all exceptions, alerts, or other documents to supervise for excessive trading, active accounts, and excessive commissions for customers of the representative. The firm's response to that request was incomplete because it failed to include any of the Excessive Trading Reports available through its clearing firm and failed to include any excessive trade alerts that had stopped appearing on the firm's system. FINRA sent a series of follow-up requests to the firm to ascertain the completeness of the firm's response. After multiple discussions with FINRA, the firm contacted the service provider that generated the firm's excessive trade alerts and became aware that excessive trade alerts could and had stopped appearing even if they had not been cleared. The firm then made a complete production of all excessive trade alerts and completed its production of the Excessive Trade Reports.
(**FINRA Case #2023080627901**)

Park Avenue Securities LLC (CRD #46173, New York, New York)
September 24, 2024 – An AWC was issued in which the firm was censured and fined $125,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that its supervisory system and WSPs were not reasonably designed to achieve compliance with FINRA Rule 2111 or the Care Obligation of Reg BI as they pertain to mutual fund share class recommendations to retirement plan customers. The findings stated that specifically, where these customers did not qualify for a Class A sales charge waiver from a mutual fund, the firm's WSPs failed to describe the steps that it should take to evaluate whether recommendations to purchase Class A shares or Class C shares were in their best interest or suitable for them when they were eligible to purchase Class R shares. In this situation, the firm did not assess whether it would have been better for certain retirement plan customers to purchase Class R shares, and the firm did not provide

supervisors with guidance or information necessary to make this assessment. As a result of these supervisory weaknesses, the firm did not reasonably supervise mutual fund share class recommendations to certain retirement plan customers and failed to identify retirement plan customers that purchased Class A or C shares when they were eligible to purchase—and would have benefitted by purchasing—Class R shares. These purchases caused the customers to incur $91,344.52 in either additional operating fees (for those customers who purchased Class C shares) or front-end sales charges (for those customers who purchased Class A shares). The firm has already paid this amount in restitution to these customers. In addition, by failing to establish, maintain, and enforce WSPs reasonably designed to achieve compliance with Reg BI, the firm failed to comply with Reg BI's Compliance Obligation. Ultimately, the firm revised its supervisory system and its supervision of mutual fund share class recommendations to retirement plan customers. (**FINRA Case #2021070875201**)

The Oak Ridge Financial Services Group, Inc. (CRD #42941, Golden Valley, Minnesota)
September 27, 2024 – An AWC was issued in which the firm was censured, fined $270,000 and ordered to pay $68,857.69, plus interest, in restitution to customers. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it charged unfair prices in corporate bond transactions. The findings stated that the firm relied solely on inter-dealer quotes to determine the prevailing market price and failed to consider when a contemporaneous inter-dealer transaction or institutional customer transaction price was available. By failing to correctly assess the prevailing market price, the firm caused its customers to pay more than they should have or receive less than they should have in transactions with the firm, resulting in customer harm in the amount of $50,294.94. In addition, in other corporate bond transactions where the firm did use the correct prevailing market price, it imposed a mark-up or mark-down that was unfair to the customer. The mark-ups and mark-downs charged were not fair and reasonable compared to other contemporaneous mark-ups and mark-downs of similar bonds, taking into consideration all relevant factors, including the type of security involved, the availability of the security in the market, the price of the security, and the size of the transaction. As a result, the customers suffered harm in the amount of $18,562.75. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to achieve compliance with fair pricing rules. The firm's WSPs did not include any process for determining the prevailing market price and the WSPs unreasonably gave representatives unilateral discretion to set mark-ups or mark-downs of corporate bonds at or below five percent, even though that level of mark-up or mark-down was not always fair in light of all relevant circumstances. Further, because the firm set thresholds for supervisory review at unreasonably high mark-up and mark-down levels, most of the corporate bond

trades at issue were automatically bulk-approved and not reviewed by a supervisor. Moreover, the firm's supervisory reviews considered only the portion of the mark-up or mark-down attributable to the registered representative and not other portions of the mark-up or mark-down, such as the portion attributable to the firm's trading desk. The firm has since implemented a revised set of WSPs to address the deficiencies. (**FINRA Case #2021070609801**)

Cambridge International Securities, LLC (CRD #39137, Westport, Connecticut)
September 30, 2024 – An AWC was issued in which the firm was censured, fined $200,000 and required to certify that it has remediated the issues identified in the AWC and implemented a reasonably designed supervisory system, including WSPs. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish, maintain, and enforce a supervisory system reasonably designed to supervise foreign associates (FA). The findings stated that the firm's WSPs lacked reasonable guidance to supervisors on how to assess whether FAs' securities activities exceeded the bounds of their registration. The firm did not reasonably monitor the FAs' securities activities to assess the location of their customers and counterparties. In addition, the firm did not consistently require FAs to complete annual compliance certifications, OBA disclosure forms, or written disclosure of private securities transactions, even though its WSPs required all registered representatives to do so. Furthermore, the firm failed to reasonably respond to red flags in emails that one of its FAs was facilitating securities transactions with other broker-dealers and for investors in the United States. The findings also stated that the firm failed to maintain and preserve electronic communications when it allowed an FA to use an outside email account to conduct firm business when it terminated his registration. The firm did not assign the FA a firm email or require that all of his communications regarding firm business be retained by the firm. The FA used his personal email account for business-related communications, including communications with potential securities customers and other broker-dealers. The firm was aware that the FA was using a personal email account for business-related communications, as the FA copied firm principals on some but not all such communications. As a result, the firm failed to preserve certain of these communications. The findings also included that the firm improperly permitted an FA to engage in securities activities with and for persons in the United States when he did not have the required registration to do so. The FA's activities included discussing securities transactions and exchanging related paperwork with investors and broker-dealers located in the United States. Specifically, the firm and the FA earned a commission by facilitating a private secondary securities transaction between two institutional investors located in the United States. The FA helped to introduce and exchange documents and information between the investors, through two other broker dealers also located in the United States. When the firm became aware of the FA's activities, the firm failed to restrict his activities, register him in

the appropriate capacity, or otherwise reasonably respond. In a later instance, the FA, through two other broker-dealers, introduced an institutional seller of certain private company shares to an institutional investor and exchanged documents and information between the parties, through the other broker-dealers. All of the parties except the FA were located in the United States. The firm has terminated the FA's registration. (**FINRA Case #2020068885402**)

Merrill Lynch, Pierce, Fenner & Smith Incorporated (CRD #7691, New York, New York)
September 30, 2024 – An AWC was issued in which the firm was censured and fined $2,000,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to accurately report execution times for certain primary market transactions in TRACE-eligible securities. The finding stated that the misreporting occurred because the firm failed to include a field for execution time for market-linked primary market transactions when they became TRACE reportable. As a result, the firm's systems misclassified each transaction's processing time as the execution time, and the firm inaccurately reported the processing time as the execution time to TRACE. Subsequently, the firm corrected the issue and reported it to FINRA. The findings also stated that the firm failed to report certain allocations of TRACE-eligible securities to client accounts. The firm failed to report customer allocations in TRACE-eligible securities as separate transactions to TRACE but, instead, reported each block transaction as a single transaction. Subsequently, the firm corrected the issue and reported it to FINRA. The findings also included that the firm failed to report the No Remuneration (NR) indicator for certain transactions in TRACE-eligible U.S. Treasury Securities. The firm failed to include the NR indicator for transactions in U.S. Treasury securities that did not include transaction-based compensation. This occurred because the firm incorrectly concluded the NR indicator was not required when reporting Treasury transactions. FINRA found that the firm reported certain transactions in municipal securities to RTRS that it should not have reported. The firm reported transactions in municipal securities that a third-party dealer executed and for which the firm acted only as custodian. The over-reporting occurred because the firm failed to code its systems to suppress the reporting for such transactions. Subsequently, the firm corrected the issue and reported it to FINRA. FINRA also found that the firm's supervisory system was not reasonably designed to achieve compliance with TRACE reporting rules. Specifically, the firm did not have reasonable supervisory reviews or written procedures relating to over-reporting or under-reporting of certain transactions in TRACE-eligible securities or relating to the accuracy of execution times or NR indicators in certain TRACE reports. In addition, FINRA found that the firm's supervisory system was not reasonably designed to ensure compliance with MSRB reporting rules. The firm's supervisory system, including WSPs, was not reasonably designed to ensure compliance with RTRS reporting requirements because it did not have reasonable supervisory reviews or written procedures relating to over-reporting of certain transactions. (**FINRA Case #2019062983001**)

TD Securities (USA) LLC (CRD #18476, New York, New York)
September 30, 2024 – An AWC was issued in which the firm was censured and fined $6,000,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it engaged in instances of spoofing in U.S. Treasury securities through a former trader who worked on, and later became the head of, its U.S. Treasury trading desk. The findings stated that this trading activity occurred on the secondary market, where institutional and other market participants trade U.S. Treasury securities and U.S. Treasury futures through electronic trading platforms. The trader placed orders using the firm's trading systems under the firm's account and traded for the benefit of the firm's proprietary and customer accounts. The trader placed non-bona fide orders in the U.S. Treasury securities market to induce executions in the same U.S. Treasury security benchmark, other U.S. Treasury security benchmarks, and/or U.S. Treasury futures contracts. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to achieve compliance with securities laws and regulations and FINRA rules prohibiting spoofing. Although the firm prohibited spoofing, it had no WSPs addressing, and no systems or surveillance in place to detect, whether its traders were engaged in spoofing in U.S. Treasury securities. The firm was aware that it was not capturing any order data for U.S. Treasury securities, and that it needed order data to effectively supervise the firm's U.S. Treasury securities activity. In addition, the firm did not require business line supervisors, like the trader's direct supervisor, to review for spoofing. In fact, neither the firm nor the trader's supervisor could access or review orders that the trader entered and canceled before execution-an indicator of potential spoofing. The firm also did not conduct any surveillance or supervisory reviews for potential cross-product spoofing in the U.S. Treasury markets. The firm did not take reasonable steps to investigate whether the trader may have been engaging in potential spoofing after the trader's conduct triggered an internal surveillance alert and after an external electronic trading platform made an inquiry about the trader's activity. Following multiple inquiries from electronic trading platforms about potential spoofing by the trader, the firm suspended the trader, conducted an internal investigation, and subsequently terminated the trader. Ultimately, the firm began remediating its supervisory deficiencies. (**FINRA Case #2018059279201**)

Firm Sanctioned

SpeedTrader, Inc fka Mint Global Markets, Inc. (CRD #107403, Katonah, New York)
September 23, 2024 – An AWC was issued in which the firm was censured and required to retain an independent consultant to, among other things, conduct a comprehensive review of the adequacy of the firm's compliance with its best execution obligations, related supervisory obligations, and AML obligations. In light of the firm's financial status, the sanctions do not include a monetary fine. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to comply with its best execution obligations. The findings stated that other than considering transaction costs when initially selecting a venue, the firm's reviews for execution quality were limited to a manual bi-weekly review of 10 randomly selected executions to determine whether they received a price that was inferior to the National Best Bid or Offer (NBBO). The firm's review was unreasonable because it did not consider any execution quality factor other than price disimprovement. The firm later automated this review to include all customer executions but continued to limit its review to price disimprovement. The firm later expanded the scope of its execution quality reviews to include assessments of price improvement, execution speed, and execution size, and conducted such reviews on a security-by-security and order type basis. However, the firm still did not consider the likelihood of execution of limit orders, transaction costs, customer needs and expectations, and the existence of payment for order flow arrangements. In addition, the firm failed to reasonably review the impact its net trading arrangements with broker-dealers had on execution quality. The findings also stated that the firm routed customer orders totaling approximately 100 million shares annually to other broker-dealers that engaged in net trading activity, and thereby interjected these broker-dealers between itself and the best market for the subject securities. The findings also included that the firm failed to establish, maintain, and enforce a supervisory system, including WSPs, reasonably designed to achieve compliance with its best execution obligations. The firm's supervisory reviews relied upon unreasonably small samples of executions, failed to consider all execution quality factors, and failed to consider whether the firm could obtain better execution quality by routing to competing markets. In addition, the firm did not conduct any supervisory review to determine whether its net trading arrangements impacted execution quality. When the firm revised its WSPs to provide that it should consider the other execution quality factors to assess the existing order routing and execution arrangements and those of other markets, the WSPs failed to describe how reviews for the additional factors should be conducted, including what execution quality statistics should be considered. The WSPs were similarly devoid of any guidance for determining the circumstances in which the firm should modify its order routing arrangements. When the firm further revised its WSPs to describe how to review for certain execution quality factors, those procedures still did not address how to review for the likelihood of execution of limit orders, transaction costs, customer needs and expectations, and payment for order flow arrangements. Further, the revised WSPs did not provide guidance concerning the circumstances for modifying

the firm's order routing arrangements. FINRA found that the firm violated Rule 606 of Regulation NMS by failing to disclose material aspects of its relationship with markets to which it routed orders in its quarterly reports. FINRA also found that the firm failed to establish and implement a written AML program that was reasonably designed to achieve and monitor the firm's compliance with the requirements of the Bank Secrecy Act and its implementing regulations. The firm failed to take reasonable steps to investigate red flags of suspicious activity and failed to establish and implement policies and procedures reasonably designed to detect patterns of potentially suspicious or manipulative trading, and to conduct ongoing monitoring to identify and report suspicious transactions. In addition, FINRA found that the firm willfully violated Exchange Act Section 17(a)(1) and Exchange Act Rule 17a-14 by falsely responding "No" to the question on the firm's customer relationship summary (Form CRS) concerning legal or disciplinary history. Before filing its initial Form CRS, the firm had disclosed 16 regulatory actions on its Uniform Application for Broker-Dealer Registration (Form BD), including several settlements with FINRA and with multiple exchanges to resolve findings that the firm had inadequately supervised potentially manipulative trading. Following FINRA's investigation, the firm posted an updated Form CRS to its publicly available website that responded "Yes" to the question concerning legal or disciplinary history but did not, however, file the updated form with the SEC for another seven months.
(**FINRA Case #2017056224501**)

Individuals Barred

Waldon Fenster (CRD #7678526, Downers Grove, Illinois)
September 5, 2024 – An AWC was issued in which Fenster was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Fenster consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA in connection with an investigation that originated from a complaint made to FINRA alleging that he had committed fraud. (**FINRA Case #2024082405101**)

Roy Kevin Williams (CRD #843607, Westfield, Indiana)
September 5, 2024 – An AWC was issued in which Williams was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Williams consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA during the course of an investigation that originated from a Uniform Termination Notice for Securities Industry Registration (Form U5) submitted by his member firm. The findings stated that the Form U5 disclosed that Williams had been discharged for obtaining loans from firm clients and making misrepresentations regarding client loans on annual certifications. Although Williams initially cooperated with FINRA's investigation, he ultimately ceased doing so. (**FINRA Case #2023078783201**)

Ashlee Nicole Godfrey (CRD #5889108, Rocky Face, Georgia)
September 9, 2024 – An AWC was issued in which Godfrey was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Godfrey consented to the sanction and to the entry of findings that she refused to provide on-the-record testimony requested by FINRA in connection with its investigation into misstatements she made to a customer of her member firm using an unapproved communication platform. The findings stated that Godfrey misrepresented to the customer that certain preferred securities were insured. (**FINRA Case #2022073893001**)

Michael Charles Grande (CRD #1219255, Fort Lauderdale, Florida)
September 9, 2024 – An Office of Hearing Officers (OHO) decision became final in which Grande was barred from association with any FINRA member in all capacities. The sanction was based on the findings that Grande failed to provide information requested by FINRA pursuant to FINRA Rule 8210 in connection with its investigation into his recommendations to customers to engage in short-term mutual fund trading. The findings stated that during a call with FINRA staff, Grande stated that he did not have access to the paperwork related to the customers identified in the request and that he could not recall certain information requested. FINRA staff explained that Grande was required to submit a written response to the request. Grande stated that he needed time to think about how he was going to respond. Grande, however, did not respond to requests and did not request an extension of time to respond to requests. (**FINRA Case #2018060128401**)

Tracy Marie Longstreet (CRD #1768525, Houston, Texas)
September 11, 2024 – An AWC was issued in which Longstreet was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Longstreet consented to the sanction and to the entry of findings that she refused to provide documents and information requested by FINRA in connection with its investigation in this matter that it initiated based upon an arbitration filing disclosed in a Form U5. The findings stated that Longstreet's former member firm submitted the Form U5 amendment disclosing that a customer had filed an arbitration against it alleging misconduct involving his accounts and that his Individual Retirement Account (IRA) beneficiaries were improperly changed to personally benefit Longstreet's family and/or friends. (**FINRA Case #2024082383001**)

John A. Perez-Cubero (CRD #6674954, Bound Brook, New Jersey)
September 11, 2024 – An AWC was issued in which Perez-Cubero was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Perez-Cubero consented to the sanction and to the entry of findings that he refused to produce information and documents requested by FINRA during an investigation that originated from a Form U5 filed by his member firm. The

findings stated that the firm disclosed on the Form U5 that Perez-Cubero had been terminated due to allegations of an unauthorized disbursement from a customer's checking account that was covered by an unauthorized transfer from customer's brokerage account. Although Perez-Cubero initially cooperated with FINRA's investigation by providing documents and information and appearing for testimony, ultimately, he ceased doing so. (**FINRA Case #2023078273201**)

Tamarah Daniel Taylor (CRD #4237020, Atlanta, Georgia)
September 16, 2024 – An AWC was issued in which Taylor was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Taylor consented to the sanction and to the entry of findings that she made misrepresentations to an entity that sought to become a registered broker-dealer that she had completed a FINRA New Membership Application Form (Form NMA) for the entity, that it was a FINRA member, and that it was fully registered with the SEC as a broker-dealer. The findings stated that Taylor was hired by the entity to, among other things, register its subsidiary as a broker-dealer with the SEC, and apply for FINRA membership. Taylor began the registration process by, among other things, preparing and filing a Form BD for the entity. However, Taylor never completed and filed with FINRA a Form NMA for the entity, and the entity never became approved as a FINRA member nor fully registered as a broker-dealer. Nonetheless, Taylor falsely represented to the entity, both orally and in written correspondence, that: (1) she had, in fact, completed a Form NMA for the entity; (2) it was a FINRA member; and (3) it was fully registered with the SEC as a broker-dealer. The findings also stated that Taylor fabricated documents reflecting that the entity was a fully registered broker-dealer and FINRA member, and she provided the fabricated documents to the entity and to external auditors. (**FINRA Case #2024082375901**)

Stephen James Sullivan (CRD #3123249, Massapequa Park, New York)
September 17, 2024 – An OHO decision became final in which Sullivan was barred from association with any FINRA member in any capacity. The sanction was based on findings that Sullivan failed to provide on-the-record testimony, information, and documents requested by FINRA pursuant to FINRA Rule 8210 in connection with an investigation into potential churning and excessive trading in his customers' accounts. The findings stated that initially Sullivan appeared with counsel at testimony and testified for almost five hours. During his testimony, FINRA asked Sullivan whether he changed the investment strategy he recommended to his customers following the implementation of Reg BI. Sullivan refused to answer the question and stated that he would not provide additional testimony. At the time that Sullivan terminated the on-the-record testimony, FINRA still had a substantial number of questions remaining, including questions about Sullivan's trading in other customers' accounts. Ultimately, Sullivan refused to provide any additional

testimony and also failed to provide documents and information requested by FINRA pursuant to FINRA Rule 8210. The additional testimony, documents, and information FINRA sought were material to its investigation into Sullivan's potential churning and excessive trading in customer accounts at his member firm. (**FINRA Case #2018056490311**)

Armando Vargas (CRD #6108068, Omaha, Nebraska)
September 19, 2024 – An AWC was issued in which Vargas was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Vargas consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA in connection with an investigation into the circumstances of his termination from his member firm. (**FINRA Case #2024082479501**)

Christopher J. Booher (CRD #7645159, Kechi, Kansas)
September 20, 2024 – An AWC was issued in which Booher was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Booher consented to the sanction and to the entry of findings that he refused to produce the information and documents requested by FINRA in connection with an investigation that originated from an amended Form U5 submitted by his former member firm. The findings stated that the firm filed the amended Form U5 stating, in part, that Booher had submitted fraudulent accident only insurance policy claims on himself and a family member and submitted fraudulent business expenses for reimbursement. During the course of its investigation, the firm found that Booher had also forged birthdates on applicants' applications to quote coverage. (**FINRA Case #2024081953701**)

Maria De Los Angeles Leon (CRD #6042515, Paw Paw, Michigan)
September 20, 2024 – An AWC was issued in which Leon was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Leon consented to the sanction and to the entry of findings that she refused to provide information and documents or to appear for on-the-record testimony requested by FINRA in connection with its investigation into the circumstances surrounding the Form U5 filed by her member firm. The findings stated that the firm submitted the Form U5 disclosing that it had discharged Leon during an investigation into misappropriation of customer funds. (**FINRA Case #2024083243101**)

James Anderson Martin (CRD #2928678, Jacksonville, Illinois)
September 20, 2024 – An AWC was issued in which Martin was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Martin consented to the sanction and to the entry of findings that he refused to provide documents and information requested by FINRA in

connection with its investigation into the circumstances surrounding a Form U5 filed by his member firm. The findings stated that the Form U5 stated that the firm had discharged Martin because he borrowed money from a client. (**FINRA Case #2024082753901**)

Wilfredo Felix Jr. (CRD #2693672, North Amityville, New York)
September 23, 2024 – Felix appealed a SEC decision to the US Court of Appeals for the District of Columbia Circuit. Felix was barred from association with any FINRA member in all capacities. The SEC sustained the findings and sanctions imposed by the National Adjudicatory Counsel (NAC). The sanction was based on the findings that Felix failed to respond to multiple FINRA Rule 8210 requests for his firm's general ledger and most recent annual audited report.

The bar is in effect pending review. (**FINRA Case #2020065128501**)

Jessica Lynn Pinkard (CRD #7809362, Youngsville, North Carolina)
September 23, 2024 – An AWC was issued in which Pinkard was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Pinkard consented to the sanction and to the entry of findings that she refused to provide documents and information and to appear for on-the-record testimony requested by FINRA in connection with its investigation into the circumstances surrounding a Form U5 filed by her member firm. The findings stated that the Form U5 stated that the firm had discharged Pinkard for violating the policies of its banking affiliate by falsifying a customer's signature on a wire agreement and facilitating cash exchanges. (**FINRA Case #2024083153301**)

Brian Scott Graham (CRD #2581633, Naperville, Illinois)
September 27, 2024 – An AWC was issued in which Graham was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Graham consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA in connection with its investigation of the allegations made in an amended Form U4 submitted by his member firm. The findings stated that the Form U4 disclosed that a customer alleged that Graham made unauthorized ATM withdrawals.
(**FINRA Case #2024081749201**)

Individuals Suspended

Christopher Frank Deo (CRD #3145183, East Williston, New York)
September 3, 2024 – An AWC was issued in which Deo was fined $5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Deo consented to the sanctions and to the entry of findings that he certified to the State of New York that he had personally completed 15 hours of continuing education required to renew his state insurance license when, in fact, another person had completed that continuing education on his behalf.

The suspension was in effect from October 7, 2024, through November 6, 2024. (**FINRA Case #2023079739801**)

Roger Philip Turcotte (CRD #1180997, Lake Worth, Florida)
September 3, 2024 – An AWC was issued in which Turcotte was fined $10,000, suspended from association with any FINRA member in all capacities for two months, and ordered to pay disgorgement of certain commissions received to FINRA in the amount of $3,696.97, plus interest. Without admitting or denying the findings, Turcotte consented to the sanctions and to the entry of findings that he caused his member firm to make and preserve inaccurate books and records by mismarking as unsolicited order tickets for equity transactions that he recommended to his customers. The findings stated that four of the transactions Turcotte mismarked as unsolicited involved solicited purchases of low-priced over-the-counter (OTC) securities. However, the firm prohibited representatives from recommending such securities to their customers. Turcotte received $3,696.97 in commissions for these four transactions which, had he marked them accurately, would have been cancelled.

The suspension is in effect from October 7, 2024, through December 6, 2024. (**FINRA Case #2021069332001**)

Glenn Edwin Bridwell Jr. (CRD #1783191, Wichita, Kansas)
September 4, 2024 – An AWC was issued in which Bridwell was fined $5,000 and suspended from association with any FINRA member in all capacities for 10 business days. Without admitting or denying the findings, Bridwell consented to the sanctions and to the entry of findings that he exercised discretionary power to effect transactions in customer accounts without obtaining prior written authorization from the customers and without his member firm having accepted the accounts as discretionary. The findings stated that the customers had given Bridwell implied authority to exercise discretion in their accounts.

The suspension was in effect from October 7, 2024, through October 21, 2024. (**FINRA Case #2022074599001**)

Christopher Philip Arnella (CRD #4886531, Manasquan, New Jersey)
September 5, 2024 – An AWC was issued in which Arnella was fined $5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Arnella consented to the sanctions and to the entry of findings that he made promissory and unwarranted statements about a publicly traded company, and statements that predicted the future performance of the company's stock. The findings stated that Arnella publicly posted his opinion about what he expected the future stock price of the company to be by the end of one year. Arnella also stated, in writing, to two firm customers that there was a 100 percent chance that the company's loss in a patent litigation trial would be overturned.

The suspension was in effect from October 7, 2024, through November 6, 2024. (**FINRA Case #2020069039302**)

Kyle William Chapman (CRD #6303483, Las Vegas, Nevada)
September 5, 2024 – An AWC was issued in which Chapman was assessed a deferred fine of $5,000, suspended from association with any FINRA member in all capacities for three months, and ordered to pay deferred disgorgement of commissions received in the amount of $1,471, plus interest. The customer brought and settled an arbitration against Chapman's member firm, which Chapman was not a party to and did not participate in. Without admitting or denying the findings, Chapman consented to the sanctions and to the entry of findings that he willfully violated Reg BI by making a recommendation that was not in the customer's best interest and that was not suitable in light of the customer's investment profile. The findings stated that Chapman recommended that the customer invest a total of $50,000 in corporate bonds, a speculative, unrated debt security offered by a publicly-traded financial services company, after the customer reached out to Chapman about investing in the bonds. Chapman failed to perform reasonable diligence on the bonds before recommending it to the customer, and he failed to understand the risks related to the bonds. Chapman did not conduct a reasonable review of the offering documents, and thus did not understand that the bonds were high risk and speculative, or that, in the event of a default, bondholders' ability to enforce their rights to payment was restricted. Further, at all relevant times, the customer's investment objectives were income and preservation of capital and did not include speculation. Chapman earned $1,471 in commissions from these recommendations. The findings also stated that Chapman acted in contravention of Section 17(a)(2) of the Securities Act of 1933 (Securities Act) by making negligent misrepresentations and omissions of material fact when recommending the bonds to his customer. Chapman sent third-party risk reports to the customer that assigned a risk score of one, which represented the lowest risk, to the two-, three-, and five- year bonds, and the same risk score to cash. Before the customer made his second purchase

of bonds, the customer emailed Chapman and asked, among other things, if the bonds were "still very conservative." Chapman did not correct the customer's belief that the bonds were a conservative investment. Instead, Chapman negligently misrepresented that: (1) the company was still acquiring life insurance policies, when it in fact had ceased doing so; (2) it was "normal" for a company like the company to operate at a loss for many years; (3) the company was "more secure" as a result of its merger with another company (which resulted in the company's shift in business model toward providing liquidity to holders of illiquid investments and alternative assets); and (4) the customer should only "worry about" the five- or seven-year bonds. After receiving Chapman's response, the customer invested his second investment in the bonds.

The suspension is in effect from September 16, 2024, through December 15, 2024. (**FINRA Case #2020068655901**)

Simone Alfredo Giuseppe Garofalo (CRD #7025823, Bologna, Italy)
September 5, 2024 – An AWC was issued in which Garofalo was assessed a deferred fine of $5,000 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying the findings, Garofalo consented to the sanctions and to the entry of findings that while registered with FINRA as a foreign associate, he engaged in securities activities with and for persons in the United States without the required registration to do so. The findings stated that Garofalo used email and phone communications to discuss securities transactions and exchange related paperwork with investors and broker-dealers located in the United States. Garofalo through his member firm earned a commission by facilitating a private secondary securities transaction between two investors located in the United States. Garofalo helped to introduce and exchange documents and information between the investors, through two other broker-dealers also located in the United States. In addition, Garofalo introduced a seller of certain private company shares to an investor, and exchanged documents and information between them, through other broker-dealers. All of the parties except Garofalo were located in the United States. Eventually, one investor wired $2.5 million to buy the shares before learning, through a different firm, that the seller did not own the shares. The investor's funds were returned.

The suspension is in effect from September 16, 2024, through November 15, 2024. (**FINRA Case #2020068885401**)

Thomas Williams Rinek (CRD #2171430, Aurora, Illinois)
September 5, 2024 – An AWC was issued in which Rinek was assessed a deferred fine of $5,000 and suspended from association with any FINRA member in all capacities for 15 days. Without admitting or denying the findings, Rinek consented to the sanctions and to the entry of findings that he improperly sent nonpublic personal information of his member firm's customers to his personal email address without

the customers' knowledge or consent and in contravention of his firm's procedures. The findings stated that the information included customer names, social security and tax identification numbers, dates of birth, securities account numbers, securities positions, physical addresses, and phone numbers. Rinek improperly retained this information after his termination from his firm, while associated with another firm, but has since deleted it.

The suspension was in effect from September 16, 2024, through September 30, 2024. (**FINRA Case #2023079677001**)

John Babatunde Abolarin (CRD #2659399, Aberdeen, Maryland)
September 6, 2024 – An AWC was issued in which Abolarin was suspended from association with any FINRA member in all capacities for one month. In light of Abolarin's financial status, no monetary sanction has been imposed. Without admitting or denying the findings, Abolarin consented to the sanction and to the entry of findings that he engaged in OBAs without providing prior written notice to his member firm. The findings stated that Abolarin formed a limited liability company (LLC) through which he operated an information-technology (IT) consulting business. Abolarin's IT consulting work was his primary source of income, and he spent most of his working hours on this outside business. Moreover, Abolarin owned and operated an e-commerce storefront business through this same LLC, again without providing any notice to his firm. Abolarin's e-commerce storefront business offered products for sale to the public on an established e-commerce platform. In addition, Abolarin inaccurately affirmed on multiple annual compliance questionnaires that he had completely and accurately disclosed his OBAs to the firm. It was not until approximately seven years after he formed the LLC that Abolarin submitted a written form disclosing his OBAs to his firm.

The suspension was in effect from October 7, 2024, through November 6, 2024. (**FINRA Case #2024081647103**)

John C. Shen (CRD #4859035, Sharon, Massachusetts)
September 6, 2024 – An AWC was issued in which Shen was fined $5,000 and suspended from association with any FINRA member in all capacities for 30 days. Without admitting or denying the findings, Shen consented to the sanctions and to the entry of findings that he used an unapproved social media platform to communicate relating to his securities business. The findings stated that Shen communicated with an unknown number of customers through the social media platform's text function, including promoting investment seminars, participating in question-and-answer sessions, and providing information relating to structured notes sold through his member firm. Shen did not retain the messages and did not provide copies of them to the firm. In addition, Shen inaccurately reported on annual compliance questionnaires that all of his electronic communications with prospective customers were through his firm email address. Furthermore, the firm individually

warned Shen not to use an unapproved messaging channel to communicate with customers. Shen's misconduct caused the firm not to capture or maintain these communications, which the firm was required to do.

The suspension was in effect from October 7, 2024, through November 5, 2024. (**FINRA Case #2020067994801**)

Spencer Reed Huggett (CRD #4538364, Roslyn, South Dakota)
September 9, 2024 – An AWC was issued in which Huggett was fined $5,000 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying the findings, Huggett consented to the sanctions and to the entry of findings that he falsified the electronic signatures of customers on account documents. The findings stated that Huggett electronically signed, with prior permission, the names of 13 customers on a total of 29 account documents. Two of the customers were seniors. The documents signed by Huggett, which included new account applications and move money forms, were required books and records of his member firm. As a result, Huggett caused the firm to maintain inaccurate books and records. None of the customers complained and the transactions were authorized. In addition, Huggett falsely attested to the firm in compliance questionnaires that he had not signed or affixed another person's signature on a document.

The suspension is in effect from October 7, 2024, through December 6, 2024. (**FINRA Case #2022075290601**)

Yonglin Ren (CRD #5210376, Lincolnshire, Illinois)
September 9, 2024 – An AWC was issued in which Ren was fined $5,000 and suspended from association with any FINRA member in all capacities for 30 days. Without admitting or denying the findings, Ren consented to the sanctions and to the entry of findings that he caused his member firm to not capture or maintain communications by using an unapproved social media platform to communicate relating to his securities business. The findings stated that Ren made multiple posts in chat groups with hundreds of participants. Some of Ren's posts related to the securities industry and included posts discussing market observations, investing strategies, and services he could provide through his firm. Ren did not retain his posts and did not provide copies of the messages to his firm. In annual compliance questionnaires, Ren inaccurately stated that he only communicated with prospective customers through his firm email. In addition, Ren was previously warned by his firm to not use the social media platform to communicate with customers but continued to post in the chat groups.

The suspension was in effect from October 7, 2024, through November 5, 2024. (**FINRA Case #2021071461401**)

Justin Y. Gerow (CRD #4435995, Punta Gorda, Florida)
September 10, 2024 – An AWC was issued in which Gerow was assessed a deferred fine of $5,000 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Gerow consented to the sanctions and to the entry of findings that he caused his member firm to maintain inaccurate books and records by manually signing customer names, without the customers' prior permission, on representative of record change request forms, as part of transitioning the customers from his prior employer to his new firm. The findings stated that nearly all of the forms pertained to securities products, including a mutual fund and a variable annuity, and accordingly, those communications were records of the firm required to be preserved. One customer complained and stated that she did not consent to changing the broker-dealer for her account to Gerow's new firm.

The suspension is in effect from September 16, 2024, through December 15, 2024. (**FINRA Case #2023078871001**)

Jeremy Isleman (CRD #5784741, Islip, New York)
September 10, 2024 – An AWC was issued in which Isleman was fined $5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Isleman consented to the sanctions and to the entry of findings that he certified to the State of New York that he had personally completed 15 hours of continuing education required to renew his state insurance license when, in fact, another person had completed that continuing education on his behalf.

The suspension was in effect from October 7, 2024, through November 6, 2024. (**FINRA Case #2023079723801**)

Christopher Charles Mancini (CRD #2774915, Huntington, New York)
September 11, 2024 – An AWC was issued in which Mancini was fined $5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Mancini consented to the sanctions and to the entry of findings that he certified to the State of New York that he had personally completed 15 hours of continuing education required to renew his state insurance license when, in fact, another person had completed that continuing education on his behalf.

The suspension was in effect from October 7, 2024, through November 6, 2024. (**FINRA Case #2023079723501**)

Giovanni Perez (CRD #7742375, Naples, Florida)
September 11, 2024 – An AWC was issued in which Perez was assessed a deferred fine of $5,000 and suspended from association with any FINRA member in all capacities for four months. Without admitting or denying the findings, Perez consented to the sanctions and to the entry of findings that he willfully failed to disclose on his Form U4 that he had been charged with a felony. The findings stated that Perez was arraigned for a third-degree felony, among other charges, in Florida state court. Perez was aware of the charges against him. On a Form U4 filed approximately 18 months later for the purpose of registering with FINRA through association with a member firm, Perez falsely answered "no" to a disclosure question that asked whether he had ever been charged with any felony. As a result, Perez caused inaccurate and misleading information to be filed with FINRA.

The suspension is in effect from September 16, 2024, through January 15, 2025. (**FINRA Case #2023078910401**)

Richard Randy Mireles (CRD #5288651, San Diego, California)
September 13, 2024 – An AWC was issued in which Mireles was fined $5,000 and suspended from association with any FINRA member in any principal capacity for four months. Without admitting or denying the findings, Mireles consented to the sanctions and to the entry of findings that he failed to reasonably respond to red flags, which were escalated to him, of a registered representative who was excessively trading customers' accounts, and therefore failed to reasonably supervise. The findings stated that Mireles supervised his member firm's lower-level supervisors who reviewed certain of the firm's trade alerts and blotters, including a "high-principal solicited trade" alert. Numerous trades placed by the representative in all of the customers' accounts repeatedly appeared on that alert, which was based on a ruleset whose parameters were designed to flag solicited trades with a high principal amount. The lower-level designated supervisors reviewing trade alerts developed concerns that the representative was excessively trading customers' accounts and brought these concerns to Mireles' attention. Mireles, however, directed the supervisor to perform only trade-by-trade assessments to review for compliance with Reg BI and suitability, and not to review the series of trades that the representative was placing within an account for potential excessive trading. The representative excessively traded the customers' accounts, causing a level of trading inconsistent with the customers' investment profiles and that was not in their best interest or was not suitable. Collectively, the customers paid more than $2.2 million in total trading costs and incurred realized losses totaling approximately $2.2 million.

The suspension is in effect from October 21, 2024, through February 20, 2025. (**FINRA Case #2023080627902**)

Christina Skipper (CRD #7097968, Denver, Colorado)
September 13, 2024 – An AWC was issued in which Skipper was fined $5,000 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Skipper consented to the sanctions and to the entry of findings that she fabricated an email that included a redemption request her member firm had purportedly sent to a product issuer in an attempt to conceal that her team failed to submit the form on behalf of a customer before the deadline expired. The findings stated that Skipper's firm was later able to redeem the investment, and the customer did not suffer any loss as a result of Skipper's misconduct.

The suspension is in effect from September 30, 2024, through December 29, 2024. (**FINRA Case #2023079509001**)

Albert Mosseri (CRD #5624212, Brooklyn, New York)
September 16, 2024 – An AWC was issued in which Mosseri was fined $5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Mosseri consented to the sanctions and to the entry of findings that he certified to the State of New York that he had personally completed 15 hours of continuing education required to renew his state insurance license when, in fact, another person had completed that continuing education on his behalf.

The suspension is in effect from October 21, 2024, through November 20, 2024. (**FINRA Case #2023079727001**)

Monique Russell (CRD #6274243, Riverview, Florida)
September 16, 2024 – An AWC was issued in which Russell was fined $5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Russell consented to the sanctions and to the entry of findings that she certified to the State of New York that she had personally completed 15 hours of continuing education required to renew her state insurance license when, in fact, another person had completed that continuing education on her behalf.

The suspension is in effect from October 21, 2024, through November 20, 2024. (**FINRA Case #2023079916101**)

Rocio Tapia (CRD #5523793, Redwood City, California)
September 16, 2024 – An AWC was issued in which Tapia was fined $2,500 and suspended from association with any FINRA member in all capacities for 10 business days. Without admitting or denying the findings, Tapia consented to the sanctions and to the entry of findings that before taking the Certified Financial Planner (CFP)

exam, she solicited and received exam content, which violated the CFP Board testing rules. The findings stated that Tapia had agreed to abide by the CFP's Pathway Agreement, which prohibited exam misconduct before, during, and after exam administration. However, on three occasions prior to taking the exam, Tapia solicited and received information regarding exam content from individuals on a group messaging platform who had already taken the exam earlier. Subsequently. the CFP Board's Disciplinary and Ethics Commission (DEC) found that Tapia's actions constituted exam misconduct in violation of the Pathway Agreement. The DEC imposed a three-year bar on Tapia from applying for or obtaining the CFP certification and voided her exam results. Later that year, the Appeals Commission of the CFP Board upheld the DEC's findings and affirmed the sanctions.

The suspension was in effect from October 21, 2024, through November 1, 2024. (**FINRA Case #2022076173202**)

Robert Kennedy Thompson (CRD #1975407, Oak Lawn, Illinois)
September 16, 2024 – An AWC was issued in which Thompson was assessed a deferred fine of $5,000 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying the findings, Thompson consented to the sanctions and to the entry of findings that he engaged in an OBA without providing prior written notice to his member firm. The findings stated that Thompson served as a business development officer of an outside bank after his firm denied his request to pre-approve his employment in that capacity at the bank. In this role, Thompson sold financial products and received compensation of approximately $85,000.

The suspension is in effect from September 16, 2024, through November 15, 2024. (**FINRA Case #2023080041701**)

Bert Kenji Takita Jr. (CRD #5852632, Honolulu, Hawaii)
September 18, 2024 – An AWC was issued in which Takita was assessed a deferred fine of $5,000 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying the findings, Takita consented to the sanctions and to the entry of findings that he engaged in several OBAs without providing prior written notice to his member firm. The findings stated that Takita's activities were outside the scope of his relationship with the firm and included businesses related to insurance sales; the purchase, development, sale, and management of real property; and solar panel sales and installation. Takita received compensation from his insurance business; and he served as an owner, manager, or member of the companies through which he conducted his real estate and solar panel businesses.

The suspension is in effect from October 7, 2024, through December 6, 2024. (**FINRA Case #2023079877001**)

Christian Eduardo De Berardinis (CRD #4312327, West Palm Beach, Florida)
September 19, 2024 – An AWC was issued in which De Berardinis was assessed a deferred fine of $15,000, suspended from association with any FINRA member in all capacities for 24 months, and ordered to pay deferred disgorgement of selling compensation in the amount of $22,500, plus interest. Without admitting or denying the findings, De Berardinis consented to the sanctions and to the entry of findings that he participated in private offerings of securities that raised $2.45 million from customers of his member firm without providing prior written notice to, or receiving approval from, his firm. The findings stated that De Berardinis introduced the customers to the chief executive officer (CEO) of a dairy company and recommended that they invest in the company. De Berardinis also facilitated the customers' investments by providing them with information about the investment. In some cases, De Berardinis assisted customers with paperwork and, at his customers' requests, transferred funds from the customers' firm accounts to the company to fund their investments. De Berardinis received $22,500 from the company in referral fees. In addition, De Berardinis falsely responded to questions about whether he had participated in private securities transactions on annual firm compliance questionnaires.

The suspension is in effect from October 7, 2024, through October 6, 2026.
(**FINRA Case #2023079207702**)

Anida Venniro (CRD #5121189, West Bloomfield, Michigan)
September 20, 2024 – An AWC was issued in which Venniro was assessed a deferred fine of $5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Venniro consented to the sanctions and to the entry of findings that she engaged in an OBA without providing prior written notice to her member firm. The findings stated that Venniro provided property management and commercial real-estate related services to two firm customers, with the reasonable expectation of receiving compensation for such services. This activity was outside the scope of Venniro's relationship with her firm.

The suspension was in effect from October 7, 2024, through November 6, 2024.
(**FINRA Case #2021070890701**)

Harshavardhan Reddy Pakhal (CRD #6354296, Mountain View, California)
September 26, 2024 – An AWC was issued in which Pakhal was assessed a deferred fine of $5,000 and suspended from association with any FINRA member in all capacities for six months. Without admitting or denying the findings, Pakhal consented to the sanctions and to the entry of findings that he engaged in OBAs without providing prior written notice to, or receiving written approval from, his member firm to engage in those activities. The findings stated that Pakhal began working for an international retail company as a director in the company's corporate

development department. Pakhal assisted with various investment projects that the company's supervisors and managers were considering, including coordinating project activities and ensuring timely task completion. The company paid Pakhal approximately $530,000. While employed by the company, Pakhal incorrectly answered "No" on annual compliance certifications to questions asking whether he was involved in any OBAs. Later, again without providing notice to his firm, Pakhal accepted a separate position as vice president of corporate development for a technology company. Pakhal's responsibilities included preparing presentations for senior management and assisting with fundraising efforts. The technology company paid Pakhal approximately $77,500. Pakhal's firm discovered his employment with both companies when it reviewed a press release announcing his new position with the technology company. Pakhal initially denied to his firm that he had any outside employment, but he later admitted that the press release was accurate.

The suspension is in effect from October 7, 2024, through April 6, 2025. (**FINRA Case #2023080263401**)

Decisions Issued

The OHO issued the following decisions, which have been appealed to or called for review by the NAC as of September 30, 2024. The NAC may increase, decrease, modify or reverse the findings and sanctions imposed in the decisions. Initial decisions where the time for appeal has not yet expired will be reported in future FINRA Disciplinary & Other Actions.

Mark Sam Kolta (CRD #5324620, Miami, Florida)
September 5, 2024 – Kolta appealed an OHO decision to the NAC. Kolta was barred from association with any FINRA member in all capacities and ordered to pay disgorgement of commissions received in the amount of $297,823, plus prejudgment interest. In light of the bar, a fine and suspension were assessed but not imposed. The sanctions were based on the findings that Kolta made unsuitable recommendations to 16 customers, six of whom were seniors, to invest over $4.8 million in a non-traded real estate investment trust (REIT). The findings stated that Kolta's recommendations to the customers were unsuitable based on the customers' financial situations, investment objectives, and risk tolerances, including the excessive concentrations of the REIT in relation to their net worth. The prospectus described the REIT as a speculative, high-risk investment appropriate only for persons who could afford a complete loss of their investment, which the senior customers could not afford. Further, most of the customers had modest incomes and relatively low net worth and therefore needed liquidity when they invested in the REIT. Despite their liquidity needs, Kolta recommended that customers invest a large percentage of their liquid net worth in the REIT, which was not traded and

was illiquid. From his sales, Kolta received commissions of $297,823. Subsequently, all customers filed statements of claim against Kolta's member firm with FINRA, and the firm settled all arbitration claims by paying the customers millions of dollars. The findings also stated that Kolta caused his firm to make and preserve false books and records. Kolta caused materially false and inaccurate information to be recorded on new account forms, updates to customer account forms, and REIT investment documents for each of his customers, which were then retained by his firm. Kolta repeatedly recorded inaccurate income, net worth, and liquid net worth figures for the customers, and also inaccurately recorded decades of investment experience across all types of investment products for the customers and overstated their investment objectives and risk tolerances. The findings also included that Kolta falsified account records and investment documents for the customers on multiple occasions so they would be permitted to buy the REIT. Kolta falsified information about the customers' net worth, investable or liquid assets, income, assets held away from his firm, investment objectives, and risk tolerance. Without Kolta's falsifications, his firm would likely have not allowed the customers to make many of the REIT investments. FINRA found that Kolta sent customers emails that made misleading, unwarranted, and promissory statements. Kolta's emails were not fair and balanced because they failed to address the risks associated with an investment in a REIT. In addition, Kolta failed to obtain approval from a qualified firm principal before sending each of the emails. Kolta's firm later disciplined him with a letter of caution for his failure to get a principal's approval before sending the emails.

The sanctions are not in effect pending review. (**FINRA Case #2018057297102**)

Jose Luis Centeno (CRD #6368188, Secaucus, New Jersey)
September 23, 2024 – Centeno appealed an OHO decision to the NAC. Centeno was fined $10,000 and suspended from association with any FINRA member in all capacities for 12 months. The sanctions were based on findings that Centeno falsely marked his member firm's records to show that he had reviewed exception reports for suspicious trading activity when he had not. The findings stated that Centeno hastily batched and marked as reviewed numerous exception reports assigned to him, long after the reports were generated. Many of the reports contained hundreds and even thousands of transactions, but he typically spent only a few seconds on each report. In hearing and on-the-record testimony provided to FINRA, Centeno admitted that he falsified records of his purported review. Although Centeno vaguely suggested he might have looked at some transactions in some exception reports, he proffered no evidence or specific memory of reviewing any of the reports. Further, Centeno admitted that he did not review all the transactions in the reports although he also testified that he was expected to review the reports in their entirety.

The sanctions are not in effect pending review. (**FINRA Case #2020066079903**)

Complaint Filed

FINRA issued the following complaints. Issuance of a disciplinary complaint represents FINRA's initiation of a formal proceeding in which findings as to the allegations in the complaint have not been made, and does not represent a decision as to any of the allegations contained in the complaint. Because these complaints are unadjudicated, you may wish to contact the respondents before drawing any conclusions regarding the allegations in the complaint.

Shadi Taysir Barakat (CRD #5031281, Cresskill, New Jersey)
September 9, 2024 – Barakat was named a respondent in a FINRA complaint alleging that he failed to provide on-the-record testimony requested by FINRA pursuant to FINRA Rule 8210 as a part of its investigation into whether he engaged in churning and excessive trading in his customers' accounts. The complaint alleges that Barakat's refusal to appear for testimony impeded FINRA's investigation into his potential misconduct. (**FINRA Case #2018056490315**)

Firms Suspended for Failure to Provide Information or Keep Information Current Pursuant to FINRA Rule 9552

(The date the suspension began is listed after the entry. If the suspension has been lifted, the date follows the suspension date.)

Airlink Markets, LLC (CRD #322261)
Issaquah, Washington
(September 3, 2024)
EnrichHer Funding LLC (Funding Portal Org ID #292218)
Atlanta, Georgia
(September 3, 2024)
FINRA Case #2023077514101

Investments for You, Inc. (CRD #29257)
Marysville, Ohio
(July 26, 2024 – September 30, 2024)
FINRA Case #2021069377401

Wood (Arthur W.) Company, Inc. (CRD #3798)
Boston, Massachusetts
(September 3, 2024)

Wood (Arthur W.) Company, Inc. (CRD #3798)
Boston, Massachusetts
(September 6, 2024)

Individuals Barred for Failure to Provide Information or Keep Information Current Pursuant to FINRA Rule 9552(h) (If the bar has been vacated, the date follows the bar date.)

Zev Marten Bishop (CRD #5826058)
Sarasota, Florida
(September 9, 2024)
FINRA Case #2023079377301

Juan Antonio Gauna (CRD #6121819)
McAllen, Texas
(September 30, 2024)
FINRA Case #2023080795301

Timothy Fleming Jefferson (CRD #5004750)
Columbia, Tennessee
(September 27, 2024)
FINRA Case #2023079582601

Mariah Nagy (CRD #7317776)
North Royalton, Ohio
(September 9, 2024)
FINRA Case # 2023078844701

Barak Rebibo (CRD #6779701)
Dania, Florida
(September 17, 2024)
FINRA Case #2024081092201

Courtney Smith (CRD #4974726)
Washington, District of Columbia
(September 16, 2024)
FINRA Case #2024081563601

Daniel James Turner (CRD #6279874)
Philadelphia, Pennsylvania
(September 6, 2024)
FINRA Case #2023079560601

Individuals Suspended for Failure to Provide Information or Keep Information Current Pursuant to FINRA Rule 9552(d)

(The date the suspension began is listed after the entry. If the suspension has been lifted, the date follows the suspension date.)

Juan Manuel Bernal Gomez (CRD #6722271)
Winter Park, Florida
(September 16, 2024)
FINRA Case #2021072405401

James Fredrick Easter (CRD #74758)
Draper, Utah
(September 23, 2024)
FINRA Case #2022074726601

Janelle Kay English (CRD #6229377)
Tulsa, Oklahoma
(September 23, 2024)
FINRA Case #2024082093501

Sara Therese Jankowski (CRD #6639418)
Crown Point, Indiana
(September 27, 2024)
FINRA Case #2024080968401

David Jerry Love (CRD #4788074)
Edmond, Oklahoma
(September 30, 2024)
FINRA Case #2024082371501

James Uriel Marrero (CRD #5332847)
Lindenwold, New Jersey
(September 27, 2024)
FINRA Case #2024081954801

Luis Quintanar Castanon (CRD #7475634)
Naperville, Illinois
(September 13, 2024)
FINRA Case #2023078733401

Michael Joseph Russo (CRD #3072489)
Manorville, New York
(September 16, 2024)
FINRA Case #2021073013701

Individual Suspended for Failure to Pay FINRA Dues, Fees and Other Charges Pursuant to FINRA Rule 9553

(The date the suspension began is listed after the entry. If the suspension has been lifted, the date follows the suspension date.)

Adam J. Sciuto (CRD #5613899)
Myrtle Beach, South Carolina
(June 6, 2024 – September 4, 2024)

Individuals Suspended for Failure to Comply with an Arbitration Award or Related Settlement or an Order of Restitution or Settlement Providing for Restitution Pursuant to FINRA Rule Series 9554

(The date the suspension began is listed after the entry. If the suspension has been lifted, the date follows the suspension date.)

Helen Thomasine Andrews (CRD #4951340)
Brooklyn, New York
(September 12, 2024)
FINRA Arbitration Case #18-03364

Vincent Connor Fuchs (CRD #6602274)
Austin, Texas
(September 20, 2024)
FINRA Arbitration Case #23-00384

Wentworth MacArthur Gardner (CRD #4296168)
Wesley Chapel, Florida
(July 23, 2024 – September 19, 2024)
FINRA Arbitration Case #23-01550

Colton Wade Jacob (CRD #6602283)
Austin, Texas
(September 30, 2024)
FINRA Arbitration Case #23-00386

Gail Antoinette Milon (CRD #1766745)
Tallahassee, Florida
(September 9, 2024)
FINRA Arbitration Case #22-01266

Michael Frank Paesano (CRD #1557229)
Rockville Centre, New York
(September 3, 2024)
FINRA Arbitration Case #17-02682

David Hilton Page (CRD #2874899)
Huntington, New York
(September 9, 2024)
FINRA Arbitration Case #23-01389

Amy Nuttall Zwaan (CRD #4857906)
Clovis, California
(September 3, 2024 – October 15, 2024)
FINRA Arbitration Case #20-01759