# Disciplinary and Other FINRA Actions

#### Firm Suspended

CSSC Brokerage Services, Inc. (CRD® #141630, Troy, Michigan)

February 19, 2019 – An Office of Hearing Officers (OHO) decision became final in which the firm was fined \$120,000, suspended from participating in private securities offerings in all capacities for one year and ordered to pay \$130,000, plus interest, jointly and severally, in restitution to customers. The sanctions were based on findings that the firm willfully violated Section 10(b) of the Securities Exchange Act of 1934, Rule 10b-5 thereunder, and violated FINRA Rule 2020 by defrauding investors by offering and selling securities through a bridge loan offering designed to keep its floundering parent company afloat after more than three years of failed deals, significant business losses and mounting debts that the parent company could not pay. The findings stated that an individual that controlled the firm and its affiliates, and was also chief executive officer (CEO) of the parent company, knew of the parent company's precarious financial condition, yet misrepresented and failed to disclose material information to potential and actual investors in the bridge loan offering. In connection with the bridge loan offering, the firm made misrepresentations and omissions of material facts to prospective investors. The firm did this by intentionally failing to disclose that the parent company could not make interest payments to existing bondholders and investors without raising additional capital; failing to disclose that the parent company was in default to existing bondholders and investors, and was unable to repay more than \$3 million that would eventually become due; misrepresenting that the parent company had earned, was receiving and would continue to receive millions of dollars in revenue from its development of a special purpose bank that ultimately failed to materialize and generate any revenue; touting a significant revenue event resulting from the parent company's purported association with a trust company, when no such relationship existed or ever occurred; and misrepresenting the firm and its owner's relationship with the city of Jacksonville, Florida, including that that relationship would increase the firm's assets under management by nearly \$1 billion, and generate significant revenue, when there was no basis in fact to make any such claims. The findings also stated that the firm engaged in unethical conduct by obtaining money from the public for four different investments and the bridge loan offering by making material misrepresentations and omissions of fact regarding those investments while registered with FINRA®. The findings also included that the firm, through the individual, knew that he was not registered as a representative or principal from May 2010 through December 2015. However, the individual was acting in capacities that required registration as a representative, including the solicitation of firm customers to invest in private

## Reported for April 2019

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).



placement offerings in the parent company. The firm knew, or should have known, that the individual was engaged in this conduct, despite the fact that he was not registered in any capacity with the firm. In addition, the individual was acting in capacities that required his registration as a principal. The individual was intimately engaged in firm operations and its securities business, including the hiring and retaining of registered representatives and the management of all firm subsidiaries' finances. The firm knew, or should have known, that the individual was engaged in this conduct, control and ownership of it, despite the fact that he was not registered in any capacity with the firm.

The suspension is in effect from March 4, 2019, through March 3, 2020. (FINRA Case #2015043646501)

#### Firm Fined, Individuals Sanctioned

Cantone Research Inc. (<u>CRD #26314</u>, Eatontown, New Jersey), Anthony Joseph Cantone (<u>CRD #1066139</u>, Cape Coral, Florida) and Christine Louise Cantone (<u>CRD #2687618</u>, Cape Coral, Florida)

February 14, 2019 – The firm, Anthony Cantone and Christine Cantone appealed a National Adjudicatory Council (NAC) decision to the Securities and Exchange Commission (SEC). The firm was fined \$150,000, jointly and severally, with Anthony Cantone and fined \$73,000, jointly and severally, with Christine Cantone. Anthony Cantone was suspended from association with any FINRA member in all capacities for 15 months. Christine Cantone was suspended from association with any FINRA member in any principal and supervisory capacity for two years and required to requalify by examination as a securities principal upon completion of her suspension. The NAC affirmed the findings and modified the sanctions imposed by the OHO. The sanctions were based on the findings that the firm and Anthony Cantone intentionally made material omissions and a misrepresentation in connection with the sale of securities in a series of private placements in willful violation of Section 10(b) of the Securities Exchange Act of 1934, Rule 10b-5 thereunder, and FINRA Rules 2020 and 2010. The findings stated that the firm and Anthony Cantone created a limited liability company that purchased a promissory note from an entity and issued certificates of participation (COPs) in the purchased note to customers for each offering. The firm and Anthony Cantone failed to disclose to investors negative material information when marketing the offerings that concerned the business failures of the entity's control person, including NASD® bars, bankruptcies, criminal fraud charges, substantial liens against a company he controlled, and a judgment against the control person in a breach of contract lawsuit. The findings also stated that the firm and Anthony Cantone negligently made additional material omissions in connection with the sales of securities, in violation of Section 17(a)(2) and (3) of the Securities Act of 1933. The firm, Anthony Cantone and Christine Cantone did not disclose to investors that the control person failed to timely make numerous interest payments, which were covered by undisclosed short-term loans from

them, as well as significant financial losses sustained by other of the control person's COPs. The firm and Anthony Cantone convinced investors to extend two of the COPs beyond their original maturity dates without disclosing the real reason for the extension, which was that the control person was unable to pay. The findings also included the firm, through its chief compliance officer (CCO) Christine Cantone, failed to adequately supervise the firm's and Anthony Cantone's conduct related to the control person-related COPs, and ignored numerous red flags, particularly with respect to numerous late and missed payments by the control person that the firm, through Christine Cantone, covered.

The sanctions are not in effect pending review. (Case #2013035130101)

#### Firm Fined

Kestra Investment Services, LLC fka NFP Advisor Services, LLC (CRD #42046, Austin, Texas) February 13, 2019 – A Letter of Acceptance, Waiver and Consent (AWC) was issued in which the firm was censured, fined \$225,000 and required to provide FINRA with a plan to remediate eligible customers who qualified for, but did not receive, the applicable mutual fund sales-charge waiver or appropriate share class. As part of this settlement, the firm agrees to pay restitution to eligible customers, which is estimated to total \$1,947,704 (i.e. the amount eligible customers were overcharged, inclusive of interest). Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it disadvantaged certain retirement plan and charitable organization customers that were eligible to purchase Class A shares in certain mutual funds without a front-end sales-charge. The findings stated that these eligible customers were instead sold Class A shares with a front-end sales charge, or Class B or C shares with back-end sales charges and higher ongoing fees and expenses. These sales disadvantaged eligible customers by causing such customers to pay higher fees than they were actually required to pay. The findings also stated that the firm failed to reasonably supervise the application of sales charge waivers and share class determinations for eligible mutual fund sales. The firm relied on its financial advisors to determine the applicability of sales charge waivers, but failed to maintain reasonably designed written policies or procedures to assist financial advisors in making this determination. In addition, the firm failed to adequately notify and train its financial advisors regarding the availability of mutual fund sales-charge waivers for eligible customers. The firm also failed to establish reasonably designed controls to detect instances in which they did not provide sales-charge waivers to eligible customers in connection with their mutual fund purchases. As a result, the firm overcharged eligible customers approximately \$1,648,984 for mutual fund purchases made between July 1, 2009 and February 22, 2018. (FINRA #2016048404601)

#### Individuals Barred

#### Bruce Meyers (CRD #1045447, New York, New York)

February 1, 2019 – An Offer of Settlement was issued in which Meyers was barred from association with any FINRA member in any principal capacity, assessed a deferred fine of \$20,000, and suspended from association with any FINRA member in all capacities for six months. Without admitting or denying the allegations, Meyers consented to the sanctions and to the entry of findings that he, as his member firm's CEO, failed to establish, maintain and enforce supervisory systems, including written supervisory procedures (WSPs), reasonably designed to prevent fraudulent, post-execution trade allocations and to prevent the imposition of undisclosed and excessive markups and markdowns. The findings stated that Meyers failed to adequately supervise trading in employee-related accounts, and excessive undisclosed markups and markdowns charged to customers, and trading in firm accounts and the pricing on principal or riskless principal trades for the purpose of calculating markups and markdowns markups. Meyers also failed to adequately supervise the charging of a markup or markdown in addition to a commission on any transaction and failed to adequately supervise the personnel in the firm's operation department. In addition, Meyers failed to adequately supervise confirmation disclosures to ensure accurate disclosure of the net price to the customer and the markup and markdown or similar remuneration. The findings also stated that Meyers engaged in outside business activities involving a real estate and mergers and acquisitions advisory business without providing prior written notice to his firm. Prior to and after becoming a partner or member of the advisory business, Meyers provided to it advisory and business services for which he was compensated, or had a reasonable expectation of compensation by, the advisory business.

The suspension is in effect from February 4, 2019, through August 3, 2019. (FINRA Case #2016048912703)

#### Bhenoy Dembla aka Ben Dembla (CRD #4357042, Miami Beach, Florida)

February 5, 2019 – An AWC was issued in which Dembla was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Dembla consented to the sanction and to the entry of findings that he entered, and later canceled, fictitious mutual fund sell orders to circumvent restrictions placed by his member firm and mutual fund providers on the amount of Class B shares an investor can own. The findings stated that these fictitious sell orders, and subsequent purchases of Class B shares, caused the accounts of customers to exceed the accumulation limit by a total of \$863,000. The firm subsequently provided \$31,801 in restitution to these customers. The findings also stated that Dembla caused the firm to maintain inaccurate books and records by making false entries on firm databases as to why the clients wanted to sell Class B shares. (FINRA Case #2016051014801)

#### Mitchell Lewis Bloom (CRD #1682361, Westminster, Colorado)

February 6, 2019 – An AWC was issued in which Bloom was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Bloom consented to the sanction and to the entry of findings that he refused to appear for FINRA on-the-record testimony in connection with its investigation into the reasons for his termination of employment from his member firm. The findings stated that the firm had filed a Uniform Termination Notice for Securities Industry Registration (Form U5) stating that in violation of its policies, Bloom participated in a private securities transaction and engaged in an outside business activity, without the firm's prior approval. (FINRA Case #2017056344701)

#### Michael Alejandro Castillero (CRD #4583917, Staten Island, New York)

February 6, 2019 – An AWC was issued in which Castillero was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Castillero 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 into allegations that he engaged in unauthorized trading in a customer's account at his member firm, made payments in an attempt to settle the customer's complaint regarding the trades without notifying the firm and made false statements regarding this conduct to FINRA. (FINRA Case #2018058649501)

## Arthur Mansourian (<u>CRD #5252154</u>, Sherman Oaks, California) and Trevor Michael Saliba (<u>CRD #2692057</u>, Beverly Hills, California)

February 6, 2019 – Mansourian and Saliba appealed a NAC decision to the SEC. Mansourian was barred from association with any FINRA member in all capacities and Saliba was barred from association with any FINRA member in all capacities. The NAC affirmed the findings and modified the sanctions imposed by the OHO. The sanctions were based on the findings that Saliba caused his member firm to violate restrictions imposed by FINRA by functioning in a principal capacity when prohibited from doing so. The findings stated that Saliba negotiated and signed engagement agreements on behalf of the firm, hired and participated in the hiring of a CEO and registered representatives, and reviewed the outside brokerage accounts of the firm's CCO. The findings also stated that Saliba provided falsified documents and false and misleading information to FINRA and failed to cooperate fully with its investigation. Saliba provided false supervisory approval memos to FINRA that he knew, or should have known, were forged and provided false supervisory memos that contained a signature that had been copied from another memo. Saliba also failed to turn over all his work computers and provided false testimony to FINRA about his work computers. The findings also included that Mansourian participated in obtaining backdated compliance forms that were provided to FINRA by using a private email address to send an email to private email addresses of a number of the firm's representative to solicit the forms. FINRA found that Mansourian caused the firm to maintain inaccurate books and records by participating in the creation of these backdated forms.

The bars are in effect pending review. (FINRA Case #2013037522501)

#### Casey Wayne Walker (CRD #6486547, Lake Lotawana, Missouri)

February 6, 2019 – An AWC was issued in which Walker was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Walker consented to the sanction and to the entry of findings that he refused to produce documents and information requested by FINRA during the course of an investigation it began after receiving an amended Form U5 submitted by his former member firm, which disclosed that the firm's insurance affiliate had terminated his employment for issues related to the processing of property and casualty insurance premium payments. (FINRA Case #2018058838301)

#### Kitwana Nkosi Thomas (CRD #5539984, Jacksonville, Florida)

February 7, 2019 – An AWC was issued in which Thomas was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Thomas consented to the sanction and to the entry of findings that he converted funds from his member firm by obtaining reimbursement from it to which he was not entitled. The findings stated that Thomas' firm sponsored a program by which it reimbursed its employees for personal computer equipment purchases. After obtaining the maximum reimbursement allotted to a firm employee under the program, Thomas obtained additional reimbursement of \$3,700 to which he was not entitled by utilizing the online login and password information for other firm employees. Thomas purchased computer equipment, submitted purchase receipts using the other employees' online accounts, and then cancelled the orders or returned the equipment. The employees then paid to Thomas a total of \$3,700 of the reimbursements they received. After the firm launched an investigation into the program, Thomas advised one of the employees to lie to the investigators by telling them that she was in possession of the computer, when, in fact, Thomas had purchased and returned the computer for which he submitted a reimbursement claim through that employee's online account. (FINRA Case #2017053262901)

#### Elizabeth Marie Garcia (CRD #6385917, San Tan Valley, Arizona)

February 8, 2019 – An AWC was issued in which Garcia was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Garcia consented to the sanction and to the entry of findings that, while associated with her member firm and employed by its bank affiliate, she converted funds from the bank by obtaining approximately \$9,015 in reimbursement for childcare expenses that she did not incur. The findings stated that in reimbursement requests, Garcia falsely stated that she had paid a daycare facility for childcare services on particular dates and also falsified signed certifications and fabricated signed receipts purporting to be from the daycare facility. Additionally, Garcia signed a certification in which she falsely represented that the information provided therein was accurate and that she had obtained original signatures from the childcare provider verifying receipt of her payment. When asked about her reimbursement requests during the bank's investigation of the matter, Garcia further misled the bank by falsely stating that her claimed childcare expenses were legitimate. (FINRA Case #2017053741501)

#### Martin Kirschner (CRD #1326676, Staten Island, New York)

February 11, 2019 – An AWC was issued in which Kirschner was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Kirschner consented to the sanction and to the entry of findings that he refused to appear for FINRA on-the-record testimony in connection with an investigation by FINRA into whether he failed to disclose a gift from a customer and failed to disclose his co-power-of-attorney appointment in violation of FINRA rules. (FINRA Case #2018057846201)

#### Marvin Thomas White Jr. (CRD #862895, Pegram, Tennessee)

February 11, 2019 – An AWC was issued in which White was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, White consented to the sanction and to the entry of findings that he failed to provide FINRA with requested documents and information in connection with its investigation relating to the issues reported in his Form U5 that disclosed that he had been discharged from his member firm after the its insurance company affiliate terminated his insurance appointment due to issues concerning property and casualty (automobile insurance) policies. (FINRA Case #2018058765001)

#### Sperry Randall Younger (CRD #2771029, Middletown, New York)

February 11, 2019 – A NAC decision became final in which Younger was barred from association with any FINRA member in all capacities. The NAC affirmed the findings and sanction imposed by the OHO. The sanction was based on findings that Younger provided false information to FINRA concerning his preparation of certain purported supervisory memos by testifying that he created a memorandum reflecting his approval for every investment banking transaction that his member firm entered into during his tenure as CEO and CCO. The findings stated that Younger also falsely testified that he created and signed the memos contemporaneously with the dates reflected on the memos; however, they were created to conceal the firm's violations of interim restrictions imposed by FINRA. The findings also stated that Younger failed to reasonably supervise a principal of the firm while he was subject to interim restrictions, failed to take reasonable steps to ensure that the firm complied with the interim restrictions and failed to place the principal under heightened supervision. Younger was aware that the principal was participating in hiring and negotiating, and signing engagements on behalf of the firm, but he took no steps to prevent the violative conduct. (FINRA Case #2013037522501)

#### Floyd Earl Powell (CRD #2220029, Albertville, Alabama)

February 13, 2019 – An AWC was issued in which Powell was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Powell consented to the sanction and to the entry of findings that he engaged in private securities transactions without providing notice to or obtaining approval from his member firms prior to participating in them. The findings stated that Powell solicited investors to purchase promissory notes relating to a purported real estate investment fund. Ultimately, Powell

sold \$3,491,707 in the notes to investors, many of whom were customers of the firms. Powell received a total of \$103,598 in commissions in connection with these transactions. Later, the fund filed a voluntary Chapter 11 bankruptcy petition. (FINRA #2018058504901)

#### Bruce Martin Zipper (CRD #1019731, Miami, Florida)

February 14, 2019 – An AWC was issued in which Zipper was barred from association with any FINRA member in any principal capacity and assessed a deferred fine of \$5,000. In light of Zipper's financial status, a lower fine has been imposed. Without admitting or denying the findings, Zipper consented to the sanctions and to the entry of findings that he failed to implement and enforce a reasonable anti-money laundering (AML) program at his member firm. The findings stated that affiliates of one of the firm's owners in Venezuela and Panama engaged in trading with the firm and each other that presented Zipper with red flags of suspicious activity. Zipper, however, failed to address those red flags and failed to ensure that there was annual independent testing of the firm's AML system. The findings also stated that Zipper failed to establish and maintain a system, including written procedures, reasonably designed to supervise a firm branch office or the firm's foreign bond business. The findings also included that Zipper failed to register with FINRA the branch office and an office of supervisory jurisdiction. FINRA found that Zipper failed to ensure that the firm inspected the branch office, or set forth any examination schedule or criteria in its WSPs, despite the fact that the branch was new, was staffed by foreign associates in a foreign location, transacted in complex foreign bond trading unlike the firm's historic securities business and generated the bulk of the firm's revenues. (FINRA Case #2015047215401)

#### Michael John Rappa (CRD #4799159, Roseville, California)

February 15, 2019 – An AWC was issued in which Rappa was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Rappa consented to the sanction and to the entry of findings that he engaged in undisclosed and unapproved private securities transactions. The findings stated that Rappa solicited investors to purchase promissory notes relating to a purported real estate investment fund. Rappa sold \$2,731,287 in in the fund's notes to investors, some of whom were customers of his member firm, and received a total of \$109,939 in commissions in connection with these transactions. Later the fund filed a voluntary Chapter 11 bankruptcy petition. (FINRA Case # 2018057766401)

#### Salman Rasheed (CRD #6421984, Chicago, Illinois)

February 15, 2019 – An AWC was issued in which Rasheed was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Rasheed consented to the sanction and to the entry of findings that he accepted \$390,045 in checks as gifts from an elderly customer of his member firm. The findings stated that Rasheed never disclosed to the firm his receipt of these monetary gifts. At all relevant times, Rasheed was aware that the firm's procedures prohibited registered representatives

from accepting monetary payments and gifts in excess of \$100 per year per customer. In addition, after Rasheed's resignation from the firm, he deposited into his bank account an additional \$20,000 check that the customer gave him as a gift. Shortly thereafter, a public guardian was appointed over the customer's affairs. Following the commencement of the public guardian's investigation into possible exploitation of the customer, Rasheed had two cashier's checks totaling \$410,045 issued to the customer to repay the cash gifts he had accepted from her. (FINRA #2017056077301)

#### Thomas Cameron Oakes (CRD #1354152, Montague, Michigan)

February 19, 2019 – An AWC was issued in which Oakes was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Oakes consented to the sanction and to the entry of findings that he refused to appear for FINRA on-the-record testimony during the course of an investigation initiated by FINRA after it received several complaints by customers of his claiming that he had recommended unsuitable transactions. (FINRA Case #2018058426501)

#### John William Spach (CRD #2731192, Agoura Hills, California)

February 21, 2019 – An AWC was issued in which Spach was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Spach consented to the sanction and to the entry of findings that he refused to produce documents and information requested by FINRA in connection with its investigation into potential violations relating, in part, to a customer complaint noted in his Form U5. The findings stated that Spach's member firm filed a Form U5 terminating his registration and disclosing that he had been permitted to resign while under internal review relating to the potential violation of various firm policies while attempting to settle a customer complaint with a client of his registered investment advisor. (FINRA Case #2018058884001)

#### Bradley Curtis Williams (CRD #5622102, Rochester, New York)

February 21, 2019 – 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 converted \$2,254.06 from his member firm's bank affiliate by engaging in a kiting scheme involving electronic funds transfers between bank accounts under his control. The findings stated that Williams used a provisional credit caused by the transfers to make online payments, debit-card purchases and bank transfers that he would otherwise not have been able to make because he lacked the necessary funds. A transfer, as well as the other payments and purchases Williams made using the provisional credit, caused a debit balance \$2,254.06, not including overdraft and other fees. Williams has not repaid the debit balance. (FINRA Case #2017053675002)

#### Stephen Michael Hart (CRD #5021146, Hoboken, New Jersey)

February 22, 2019 – An AWC was issued in which Hart was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Hart consented to the sanction and to the entry of findings that he failed to provide documents and information requested by FINRA in connection with its investigation into allegations that he converted money or property outside of his member firm. (FINRA Case #2018059557901)

#### Edward Beyn (CRD #5406273, Dix Hills, New York)

February 26, 2019 – Beyn appealed a NAC decision to the SEC. Beyn was barred from association with any FINRA member in all capacities. The NAC affirmed the findings and sanction imposed by the OHO. The sanction was based on the findings that Beyn churned customer accounts in violation of Section 10(b) of the Securities Exchange Act of 1934, Exchange Act Rule 10b-5 and FINRA Rule 2020. The findings stated that Beyn also excessively traded customer accounts. Beyn employed the earnings play strategy in trading these accounts and effected the transactions in the accounts on a riskless principal basis, charging the customers mark-ups and markdowns rather than commissions. Beyn chose the investments, including the volume and frequency of the trading, in his customers' accounts and the customers, who did not have sufficient investment experience and understanding to make an independent evaluation of his recommendations, routinely followed those recommendations. The level of trading by Beyn in the customers' accounts was grossly inconsistent with their investment objectives and financial and personal experiences. Beyn traded all the accounts the same, regardless of the listed investment objective and the customer's age or stated financial condition. The turnover rates and costto-equity ratios were outrageously high and demonstrated that Beyn traded the accounts without any regard for the best interest or investment objectives of his customers. Rather, the level of trading demonstrates that Beyn traded the accounts to generate revenue for himself and his member firm. The findings also stated that given the costs charged by Beyn and the firm, the accounts had virtually no chance of breaking even, much less realizing any gains for the customers no matter how the underlying investments performed. Furthermore, while Beyn's customers experienced total losses of almost \$3 million, Beyn earned almost \$650,000 from the trading in the accounts, all in the form of mark-ups and markdowns. Beyn's earnings support the findings that he acted with the scienter. The findings also included that Beyn recommended exchange traded note (ETN) investments to a customer that were qualitatively unsuitable for him. The ETNs were not suitable for an individual investor, like the customer, who purchased and held them for long periods of time. The customer's Individual Retirement Account (IRA) sustained net realized losses of \$985,000 and incurred costs of more than \$426,000. An account that the customer held in the name of a limited partnership had more than \$571,000 in net realized losses and incurred more than \$261,000 in costs. Beyn's share of the mark-ups and markdowns charged to these accounts was more than \$213,000.

The bar is in effect pending review. (FINRA Case #2015044823502)

#### Craig Scott Taddonio (CRD #4773787, Babylon, New York)

February 28, 2019 – Taddonio appealed a NAC decision to the SEC. Taddonio was barred from association with any FINRA member in all capacities. The NAC affirmed the findings and modified the sanction imposed by the OHO. The sanction was based on the findings that Taddonio failed to establish, maintain and enforce a reasonable supervisory system at his member firm in light of red flags indicating that registered representatives at his firm were, or might be, excessively trading and churning customer accounts. The findings stated that Taddonio knew of the red flags, but he took no steps to investigate them and respond to the possible excessive trading, and as a result, he failed to reasonably supervise the trading in customer accounts. Taddonio was also aware of a number of customer complaints and arbitrations alleging excessing trading and churning. The findings also stated that Taddonio gave false testimony during his on-the-record interview with FINRA regarding the recording of telephone calls between the firm and its customers.

The bar is in effect pending review. (FINRA Case #2015044823501)

#### Individuals Suspended

#### Christopher Duke Bennett (CRD #2510231, Louisville, Kentucky)

February 1, 2019 – An AWC was issued in which Bennett was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for 15 business days. Without admitting or denying the findings, Bennett consented to the sanctions and to the entry of findings that he exercised discretionary trading authority in the accounts of customers, including a senior investor, without express or written authorization from the customers and without seeking or obtaining his member firm's prior written acceptance of the accounts as discretionary.

The suspension was in effect from February 4, 2019, through February 25, 2019. (FINRA Case #2017054060301)

#### Christopher T. Dallas (CRD #3233864, Libertyville, Illinois)

February 5, 2019 – An AWC was issued in which Dallas was fined \$5,000 and suspended from association with any FINRA member in any principal capacity for 30 days. Without admitting or denying the findings, Dallas consented to the sanctions and to the entry of findings that he failed to reasonably supervise variable annuity transactions and failed to adhere to his member firm's WSPs related to supervising variable annuity transactions. The findings stated that Dallas approved variable annuity exchange applications involving two customers (a husband and wife) despite knowing that information had been altered on the disclosure documents after the customers had signed them. Dallas knew that the altered forms were never provided to the customers to review or sign, and knew (or should have known) that the customers were not even notified of the changes. Approximately one year after the transactions were approved, the customers were notified of the alterations in

the paperwork that they had signed. Neither of the customers complained to the firm, and neither were harmed by the transactions.

The suspension was in effect from March 4, 2019, through April 2, 2019. (FINRA Case #2017052426601)

#### Donald Logan (CRD #5537486, Bremerton, Washington)

February 5, 2019 – An AWC was issued in which Logan was assessed a deferred fine of \$25,000 and suspended from association with any FINRA member in all capacities for 18 months. Without admitting or denying the findings, Logan consented to the sanctions and to the entry of findings that he exercised discretionary trading authority in customer accounts without obtaining prior written authorization from his customers or prior written approval from his member firms. The findings stated that Logan executed unauthorized transactions in customer accounts without their knowledge or consent. The findings also stated that Logan caused customers to sign blank or incomplete account-related forms, intending to later use them in connection with customer transactions. The findings also included that Logan willfully failed to timely amend his Uniform Application for Securities Industry Registration or Transfer (Form U4) to disclose civil judgments and a compromise with a creditor and never disclosed one judgment.

The suspension is in effect from January 22, 2019, through July 21, 2020. (FINRA Case #2015046378601)

#### Jeffrey Evan Meyerson (CRD #1714431, Franklin Lakes, New Jersey)

February 8, 2019 – An AWC was issued in which Meyerson was fined \$5,000 and suspended from association with any FINRA member in all capacities for 20 business days. Without admitting or denying the findings, Meyerson consented to the sanctions and to the entry of findings that he caused his member firm to maintain inaccurate books and records by using his personal email to conduct his securities business, despite being advised by the firm that he was required to use his firm-approved email address for firm business. The findings stated that these communications included emails pertaining to sales literature, prospectuses, term sheets and stock purchase agreements, as well as negotiations of sales terms and fees.

The suspension was in effect from March 4, 2019, through March 29, 2019. (FINRA Case #2016048223001)

#### John Andrew Kasel (CRD #4382483, Bellevue, Washington)

February 11, 2019 – An AWC was issued in which Kasel was fined \$5,000 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Kasel consented to the sanctions and to the entry of findings that he engaged in an unapproved outside business activity by actively managing a customer's real estate properties, for which he received a total of at least \$26,500 in

compensation. The findings stated that Kesel never disclosed these activities to his member firm, even though its procedures required him to do so. In addition, Kasel incorrectly responded on firm annual compliance questionnaires that he had no outside business activities.

The suspension is in effect from March 4, 2019, through June 3, 2019. (FINRA Case #2017053496701)

#### Todd Brinson Wyche (CRD #2186536, Corvallis, Montana)

February 11, 2019 – A NAC decision became final in which Wyche was fined \$10,000 and suspended from association with any FINRA member in all capacities for four months. The NAC affirmed the findings and modified the sanctions imposed by the OHO. The sanctions were based on findings that Wyche willfully failed to amend his Form U4 to disclose a federal tax lien filed against him and his wife in the amount of \$230,265.

The suspension is in effect from March 4, 2019, through July 3, 2019. (FINRA Case #2015046759201)

#### Thomas Edward Burns III (CRD #36422, Laguna Hills, California)

February 12, 2019 – An AWC was issued in which Burns was fined \$7,500 and suspended from association with any FINRA member in all capacities for two months. Without admitting or denying the findings, Burns consented to the sanctions and to the entry of findings that he negligently made numerous mistakes causing errors and inaccuracies in identifying customer assets on alternative investment forms, thereby causing his member firm to have inaccurate books and records. The findings stated that the alternative investment forms submitted by Burns contained errors and inaccuracies due to his negligent mistakes, including computational errors, improperly classified holdings and copying errors across multiple forms.

The suspension is in effect from March 4, 2019, through May 3, 2019. (FINRA Case #2016050828001)

#### Thomas Anthony Gallo (CRD #1705791, Sea Bright, New Jersey)

February 12, 2019 – An AWC was issued in which Gallo was assessed a deferred fine of \$10,000, suspended from association with any FINRA member in all capacities for 60 days and ordered to pay \$33,337, plus interest, in deferred restitution to a customer. Without admitting or denying the findings, Gallo consented to the sanctions and to the entry of findings that he contravened Sections 17(a)(2) and 17(a)(3) of the Securities Act of 1933 by negligently misrepresenting a material fact in the sale of \$100,000 in promissory notes to investors. The findings stated that the purpose of the convertible promissory note offering (private placement) was to provide the company offering the promissory note a bridge loan to finance its operations until it received anticipated long-term financing through a public offering. Gallo's member firm acted as placement agent on the private placement

and Gallo received a total of \$8,000 in compensation in connection with the investments. Gallo negligently represented to the investors that the company had a firm commitment offering in place. The misrepresentation was material because the company's payment of interest on the promissory notes, and each investor's recovery of their principal investment, depended on the company raising significant capital in the anticipated public offering and/or on the ability of the investors to sell the company stock that they received in connection with the private placement. The public offering for the company was conducted on a best-efforts basis and did not raise the anticipated level of capital. Consequently, the company stock price dropped significantly, and the investors lost approximately \$33,337 from the private placement.

The suspension is in effect from February 18, 2019, through April 18, 2019. (FINRA Case #2017053921601)

#### Kirk James Bertsch (CRD #4132889, Spearfish, South Dakota)

February 15, 2019 – An AWC was issued in which Bertsch was suspended from association with any FINRA member in all capacities for one month and ordered to pay deferred disgorgement of commissions received in the amount of \$1,500, plus interest. FINRA determined not to impose a fine after considering, among other things, the sanctions ordered against Bertsch by the South Dakota Deportment of Labor and Regulation, Division of Insurance for the same underlying conduct. Without admitting or denying the findings, Bertsch consented to the sanctions and to the entry of findings that he engaged in an undisclosed and unapproved private securities transaction by soliciting an investor to purchase a promissory note relating to a purported real estate investment fund. The findings stated that Bertsch sold the \$50,000 note to this investor and received \$1,500 in commissions in connection with the transaction. Bertsch also personally invested \$240,000 in the promissory notes. Later, the fund filed a voluntary Chapter 11 bankruptcy petition.

The suspension was in effect from February 19, 2019, through March 18, 2019. (FINRA Case #2018059666301)

#### Thomas John Lisa Jr. (CRD #2992701, Roslyn Heights, New York)

February 15, 2019 – An AWC was issued in which Lisa was assessed a deferred fine of \$7,500 and suspended from association with any FINRA member in all capacities for four months. Without admitting or denying the findings, Lisa consented to the sanctions and to the entry of findings that he engaged in outside business activities without providing prior written notice to his member firms. The findings stated that Lisa also opened and maintained a brokerage account away from one of the firms without first notifying it in writing that he was opening the account or placing an order away from the firm.

The suspension is in effect from February 19, 2019, through June 18, 2019. (FINRA #2017054989701)

#### Thomas Edward Sova (CRD #431135, Baton Rouge, Louisiana)

February 15, 2019 – An AWC was issued in which Sova was assessed a deferred fine of \$5,000, suspended from association with any FINRA member in all capacities for five months and ordered to pay deferred disgorgement of commissions received, in the amount of \$5,000, plus interest. Without admitting or denying the findings, Sova consented to the sanctions and to the entry of findings that he participated in private securities transactions without providing written notice to, or obtaining approval from, his member firm. The findings stated that Sova solicited investors to purchase promissory notes relating to a purported real estate investment fund. Sova sold \$250,000 in the notes to investors, one of whom was his firm's customer. Sova received \$5,000 in commissions in connection with these transactions.

The suspension is in effect from February 19, 2019, through July 18, 2019. (FINRA #2018058498401)

#### Guy Stanley Waltman (CRD #1540766, Doylestown, Pennsylvania)

February 15, 2019 – An AWC was issued in which Waltman was fined \$5,000 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Waltman consented to the sanctions and to the entry of findings that he failed to disclose to his member firm that he had investment control over five securities accounts for a customer and her trust at three other broker-dealers. The findings stated that, in contravention of firm policy, Waltman did not disclose to the firm that he was serving as power of attorney and trustee for the customer and her trust and had discretionary authority over her accounts. The findings also stated that on an annual basis, Waltman completed a firm affirmation on which he should have disclosed the accounts. Waltman's lack of disclosure of the customer and her trust accounts prevented the firm from properly supervising his outside accounts, thereby exposing the firm to risk and curtailing its ability to fulfill its regulatory obligations. In addition, Waltman never disclosed his association with the firm to the other broker-dealers.

The suspension is in effect from March 18, 2019, through June 17, 2019. (FINRA Case #2016050191701)

#### Matthew Brian Marietta (CRD #5977410, Houston, Texas)

February 19, 2019 – An AWC was issued in which Marietta was assessed a deferred fine of \$10,000, suspended from association with any FINRA member in all capacities for 14 months and required to requalify as a research analyst by passing the requisite examination (Series 86/87) prior to associating with any FINRA member firm acting in that capacity. Without admitting or denying the findings, Marietta consented to the sanctions and to the entry of findings that he authored research reports about a company without disclosing to his member firm that he was engaged in employment discussions with the company, causing those reports to be misleading. The findings stated that

Marietta's firm issued a research report authored by Marietta in which he expressed the view that the company's intention to hire a full-time investor relations representative was a positive development. Soon thereafter, Marietta began speaking with the company about potentially becoming the company's investor relations representative. The company reached out to Marietta to schedule a meeting to further discuss the position. By this point, the discussions had reached a level of seriousness, with mutual expressions of interest and Marietta's candidacy clearly viable, such that he should have known that his employment discussions presented a material conflict of interest. Without disclosing that he was engaged in employment discussions with the company, Marietta's firm issued three more research reports on the company, authored by Marietta.

The suspension is in effect from March 4, 2019, through May 3, 2020. (FINRA Case #2019061078801)

#### Barry Ronald Block (CRD #1042376, Northbrook, Illinois)

February 25, 2019 – An AWC was issued in which Block was assessed a deferred fine of \$15,000 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Block consented to the sanctions and to the entry of findings that he negligently misrepresented the investment expenses when recommending variable annuity exchanges to his customers. The findings stated that on the disclosure forms provided to the customers, Block misstated the fees associated with the new variable annuity and/or the fees associated with the surrendered variable annuity. In addition, Block altered disclosure documents involving transactions after they were signed by the customers, and failed to maintain originals or copies of the disclosure forms. In his member firm's book and records. Approximately a year after the transactions were approved, the customers were notified of the errors in the paperwork that they had signed. None of the customers complained to the firm, and none were harmed by the transactions.

The suspension is in effect from March 4, 2019, through June 3, 2019. (FINRA #2017052426602)

#### Emanuel Omar Avina (CRD #5403314, Corona, California)

February 26, 2019 – An AWC was issued in which Avina was assessed a deferred fine of \$7,500 and suspended from association with any FINRA member in all capacities for 45 days. Without admitting or denying the findings, Avina consented to the sanctions and to the entry of findings that he impersonated customers of his member firm during telephone calls made to its customer service center for the purposes of liquidating securities, transferring money, obtaining account information and requesting copies of checks. The findings stated that Avina carried out all of the impersonations in order to facilitate underlying transactions and requests that the customers had authorized and

wanted executed. Avina conducted some of these impersonations in order to facilitate the customers' wishes to transfer money out of the firm in order to be managed by Avina's new investment advisory firm. Although Avina made some of the customers aware of his impersonations, other of the customers were not aware of and did not authorize him to impersonate them.

The suspension is in effect from March 4, 2019, through April 17, 2019. (FINRA Case #2017054932701)

#### **Decisions Issued**

The Office of Hearing Officers (OHO) issued the following decisions, which has been appealed to or called for review by the NAC as of February 28, 2019. The NAC may increase, decrease, modify or reverse the findings and sanctions imposed in the decision. Initial decisions where the time for appeal has not yet expired will be reported in future FINRA Disciplinary and Other Actions.

#### Peter Orlando (CRD #1142715, Barrington, Rhode Island)

February 14, 2019 – Orlando appealed an OHO decision to the NAC. Orlando was barred from association with any FINRA member in all capacities and ordered to pay \$4,000, plus interest, in restitution to a customer. The sanctions were based on findings that Orlando engaged in unethical conduct by betraying the trust of an elderly customer and assuming control over her finances. The findings stated that Orlando used his position of trust to lead the customer into giving him authority to make medical decisions for her, to grant him power of attorney for financial matters, to name him as executor in her will and to name him as primary beneficiary of her will. Orlando failed to disclose these arrangements to his member firm, which prohibited its representatives from serving in a fiduciary capacity for, or its representatives named as the beneficiary of the account of, anyone other than a family member, which the customer was not. The findings also stated that Orlando recommended that the customer surrender a variable annuity without having a reasonable basis to believe that the recommendation was suitable in light of the incurred surrender fees and costs of more than \$3,900, as well as the loss of a monthly \$626.91 payment and the opportunity for future income. The findings also included that contrary to the firm's policies, Orlando maintained pre-signed blank customer forms, a variable annuity withdrawal form and a request for electronic transfer of funds form in his customer files.

The sanction is not in effect pending the review. (FINRA Case #2014043863001)

#### Silver Leaf Partners, LLC (CRD #126694, New York, New York)

February 25, 2019 – The firm appealed an OHO decision to the NAC. The firm was fined \$100,000, prohibited from directly, or indirectly, facilitating stock loan or block trading transactions, including using a finder to introduce prospective participants in such transactions, and required to retain an independent consultant to conduct a comprehensive review of each of the firm's policies, systems and procedures (written or otherwise). The sanctions were based on the findings that the firm shared transaction-based compensation with an unregistered individual to find entities to participate in its stock loan and block trade business. The findings stated that firm paid transaction-based compensation to unregistered entities owned by its registered representatives, even after being told by the SEC that such payments violated NASD Rule 2420. The findings also stated that the firm failed to adequately supervise its business and failed to establish, maintain and enforce adequate written procedures. The firm had no written procedures in its WSPs or elsewhere, nor did it implement appropriate supervisory procedures, prohibiting or otherwise, addressing the payment of transaction-based compensation to finders or to unregistered entities owned by its representatives. The failure to have reasonable supervisory procedures resulted in improper payments to an unregistered individual and to unregistered entities affiliated with its brokers. Additionally, the firm failed to take reasonable steps in the face of red flags to prevent one of its representatives from sharing transaction-based compensation with the unregistered individual and to prevent the unregistered individual from acting as an agent on behalf of the firm. In addition, the firm did not follow up on the SEC's warning that payments to unregistered entities affiliated with its brokers were improper. The firm supervisory system, including its WSPs, also completely failed to address its stock loan and block trade introduction business and failed to follow up on red flags raised by that business.

The sanctions are not in effect pending review. (FINRA Case #2014042606902)

#### Complaints 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.

#### Andrew Manuel Garcia (CRD #6715172, Indianapolis, Indiana)

February 4, 2019 – Garcia was named a respondent in a FINRA complaint alleging that he converted approximately \$3,392 belonging to a customer of his member firm by causing the customer's federal and state tax refunds to be deposited into Garcia's firm brokerage account. The complaint alleges that the customer contacted the firm's helpline and asked

for his routing and account numbers so his tax refunds could be direct deposited into his firm brokerage account; however, Garcia provided the customer with the routing and account numbers for his own firm account. Although Garcia was presented on multiple occasions with information indicating the funds did not belong to him, he used the funds to conduct brokerage trades in his firm account and to fund transfers to his other personal banking and brokerage accounts held away from the firm. The complaint also alleges that during the firm's investigation into his misconduct, Garcia made false statements about his attempts to confirm that the funds belonged to him. (FINRA Case #2017054899801)

#### James Adam Paquette (CRD #2164109, Sullivans Island, South Carolina)

February 6, 2019 – Paquette was named a respondent in a FINRA complaint alleging that he was charged by the state of South Carolina with a felony but willfully failed to disclose it on his Form U4 for more than a year after learning about the charge. The complaint alleges that in the alternative to the willful violation, Paquette failed to disclose his felony charge on his Form U4 within thirty days after learning about the charge. (FINRA Case #2017054889201)

#### Kapil Maheshwari (CRD #6358540, Clark, New Jersey)

February 7, 2019 – Maheshwari was named a respondent in a FINRA complaint alleging he used confidential and proprietary information he learned in the course of his employment with his member firm to trade in a software company. The complaint alleges that Maheshwari worked on a team at the firm that represented a client seeking to acquire the software company. Within days of his departure from the firm, and while still registered with FINRA, Maheshwari purchased shares of the software company stock which breached his duties of loyalty and confidentiality, violated his employment agreement and contravened his confidentiality agreement with the firm. (FINRA Case #2017055608101)

#### Michael Royce Minghenelli (CRD #6067409, New York, New York)

February 15, 2019 – Minghenelli was named a respondent in a FINRA complaint alleging that he converted approximately \$200 from his member firm by taking a cash advance against a corporate credit card issued by a bank affiliated with the firm. The complaint alleges that the cash advance was unrelated to any business purpose and made in contravention of the firm's written policies and procedures. Minghenelli falsely represented to his firm that he had not made the cash advance and subsequently called the credit card issuer and reported the automated teller machine (ATM) fraud on his corporate credit card. Minghenelli denied having made the cash advance transaction until he was advised that security cameras had captured his image using the ATM at the time and place of the transaction. The complaint also alleges that Minghenelli failed to provide documents and information requested by FINRA during its investigation into the allegations of conversion. (FINRA Case #2017053549901)

#### James Bradley Schwartz (CRD #3043085, New York, New York)

February 26, 2019 – Schwartz was named a respondent in a FINRA complaint alleging that he willfully violated Section 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder, and also violated FINRA Rule 2020 by churning and excessively trading the accounts of customers of his member firm. The complaint alleges that Schwartz's trading was unsuitable and caused combined losses of more than \$660,000 in these customers' accounts. At the same time, Schwartz's trading generated gross sales credits and commissions of approximately \$277,705, of which he received more than \$194,000. The complaint also alleges that Schwartz conducted fraudulent and deceptive trading by exercising de facto control over the customers' accounts and engaging in unauthorized trading. Schwartz executed trades with a total principal value of approximately \$10 million without his customers' authorization, including unauthorized trades he executed in a customer's account after the customer had died. (FINRA Case #2016051704302)

#### Firm Expelled 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.)

#### Good Capital Ventures (Funding Portal Org ID #286475)

Massillon, Ohio (February 5, 2019) FINRA Case #2018056838801

#### Firms Cancelled for Failure to Pay Outstanding Fees Pursuant to FINRA Rule 9553

#### Crystal Bay Securities Inc. (CRD #142339)

Delray Beach, Florida (February 13, 2019)

#### Dakoy Capital Markets LLC (CRD #169954)

Huntington, New York (February 22, 2019)

#### Spencer Edwards, Inc. (CRD #22067)

Centennial, Colorado (February 1, 2019)

### Wheelhouse Securities Corporation (CRD #149075)

St. Louis, Missouri (February 1, 2019)

## Firms Suspended for Failure to Supply Financial Information 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.)

#### Financial West Group (CRD #16668)

Reno, Nevada (February 7, 2019)

#### Financial West Group (CRD #16668)

Reno, Nevada (February 10, 2019)

#### Firm Suspended for Failing to Pay Arbitration Awards Pursuant to FINRA Rule 9554

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

#### Crystal Bay Securities Inc. (CRD #142339)

Delray Beach, Florida (February 5, 2019) FINRA Arbitration Case #18-00218

#### 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.)

#### Phillip K. Austin (CRD #5803618)

Desoto, Texas (February 11, 2019) FINRA Case #2018059726201

#### Tywan Chariff Bishop (CRD #6441836)

New York, New York (February 19, 2019) FINRA Case #2018059644301

#### Glen Derek Delaney (CRD #4971534)

North Babylon, New York (February 11, 2019) FINRA Case #2017054192101

#### Peter Richard Erhart (CRD #1681938)

Roanoke, Virginia (February 4, 2019) FINRA Case #2018058452701

#### Herbert H. Hafen (CRD #867068)

New Canaan, Connecticut (February 1, 2019) FINRA Case #2018059821901

#### **Anubhav Jain (CRD #6618377)**

New York, New York (February 11, 2019) FINRA Case #2018059416101

#### Tristan Vonte O'Neal (CRD #5898324)

West Des Moines, Iowa (February 25, 2019) FINRA Case #2018059356301

#### Steven Harwell Owen (CRD #4302165)

Hurst, Texas (February 11, 2019) FINRA Case #2018059680901

#### Marc Salvatore Pico (CRD #2771162)

Fort Lee, New Jersey (February 4, 2019) FINRA Case #2018059327101

#### Thomas James Renison (CRD #6039707)

South Glastonbury, Connecticut (February 11, 2019) FINRA Case #2018057688801

#### Michael Duane Smith (CRD #5785558)

Dallas, Texas (February 4, 2019) FINRA Case #2018059764701

#### Aaron Anthony Trotter (CRD #6622731)

Islip Terrace, New York (February 19, 2019) FINRA Case #2018059727801

### Individuals Revoked for Failure to Pay Fines and/or Costs Pursuant to FINRA Rule 8320

(If the revocation has been rescinded, the date follows the revocation date.)

#### Leigh McCobb Garber (CRD #2768572)

Cazenovia, New York (February 22, 2019) FINRA Case #2015044682301

#### Darnell Kenneth Mote (CRD #6089505)

Jacksonville, Florida (February 1, 2019) FINRA Case #2015048372201

#### 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.)

#### Lisa Acca (CRD #4661358)

Staten Island, New York (February 22, 2019) FINRA Case #2018060634301

#### Marcus E. Boggs (CRD #5055667)

Chicago, Illinois (February 4, 2019) FINRA Case #2018060891101

#### Nicholas Alec Bougopoulos (CRD #6541069)

San Francisco, California (February 4, 2019) FINRA Case #2018059966701

#### Harlan Trabert Cardwell III (CRD #2247146)

Vernon, Texas (February 25, 2019) FINRA Case #2018060740301

#### Robert P. Cash (CRD #1567639)

Manhasset, New York (November 13, 2018 – February 1, 2019) FINRA Case #2018058204601

#### Rafael Golan (CRD #1074079)

Boca Raton, Florida (February 25, 2019) FINRA Case #2019060635701

#### Edwin Alberto Gomez (CRD #5968994)

Rockville, Maryland (February 1, 2019) FINRA Case #2018059884201

#### Melissa Paola Irizarry (CRD #6795879)

Edison, New Jersey (February 11, 2019) FINRA Case #2018059076001

#### Jeffrey Paul Knowles (CRD #2822705)

Parkland, Florida (February 1, 2019) FINRA Case #2018059598901

#### Charles William LaMarca (CRD #4308390)

Bellmore, New York (February 4, 2019) FINRA Case #2018060720701

#### Lisa Jeanne Lastrapes (CRD #2739854)

Grapevine, Texas (November 19, 2018 – February 13, 2019) FINRA Case #2017055788301

#### David William Laveck (CRD #5105803)

Farmington, New York (February 11, 2019) FINRA Case #2018058586101

#### Kevin Michael Won Lee (CRD #6544158)

Redondo Beach, California (February 4, 2019) FINRA Case #2018060150701

#### William Roger Maurer (CRD #6876160)

Jacksonville, Florida (February 19, 2019) FINRA Case #2018059669801

#### Jason Paul Nye (CRD #2394082)

Centerville, Ohio (February 19, 2019) FINRA Case #2018057731201

#### Anthony Frank Sercia (CRD #2067424)

Staten Island, New York (February 11, 2019) FINRA Case #2018059045001

#### Rani Soto (CRD #6016117)

Bayonne, New Jersey (February 4, 2019) FINRA Case #2018059766701

#### Cornell E. Stanley Jr. (CRD #6587701)

Nottingham, Maryland (November 21, 2018 – February 19, 2019) FINRA Case #2018058668901

#### Perry Joseph Tarica Jr. (CRD #715741)

Green Oaks, Illinois (November 19, 2018 – February 1, 2019) FINRA Case #2018059069401

#### John Luis Torres (CRD #6322231)

Sherman Oaks, California (February 19, 2019) FINRA Case #2018059605301

#### Individual Suspended for Failure to Pay Arbitration Fees 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.)

#### Dwarka Persaud (CRD #1396880)

Scotch Plains, New Jersey (November 16, 2017 – February 19, 2019) FINRA Arbitration Case #14-03762

#### Individuals Suspended for Failure to Comply with an Arbitration Award or Settlement Agreement Pursuant to FINRA Rule 9554

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

#### Pedro Enrique Boj (CRD #2736614)

Coral Cables, Florida (February 26, 2019) FINRA Case #2018060967401/ARB180038

#### Carter Page Brooks (CRD #2477279)

Richmond, Virginia (February 19, 2019) FINRA Arbitration Case #18-02090

#### Patrick William Lofaro (CRD #2502145)

Lindenhurst, New York (February 19, 2019) FINRA Arbitration Case #17-02508

#### George Luis Muniz (CRD #1937184)

Waccabuc, New York (February 19, 2019) FINRA Arbitration Case #17-03309

#### Robert Telford Norton (CRD #4169694)

Salem, Oregon (February 19, 2019) FINRA Arbitration Case #18-02334

#### Peter James Walsworth (CRD #4708071)

Lakewood Ranch, Florida (February 19, 2019) FINRA Arbitration Case #18-02716