

# Disciplinary and Other FINRA Actions

## Firms Fined

### **Crown Capital Securities, L.P. ([CRD #6312](#), Orange, California)**

June 4, 2024 – A Letter of Acceptance, Waiver and Consent (AWC) was issued in which the firm was censured, fined \$50,000, and ordered to pay \$116,390.58, 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 failed to reasonably supervise transactions that its registered representatives placed directly with product sponsors on behalf of firm customers (i.e., direct business transactions). The findings stated that the firm did not take steps reasonably designed to ensure that direct business transactions appeared on the firm's daily trade blotter, causing the firm to fail to run approximately 9,000 transactions through exception reports used to identify potential sales practice violations. The firm completed a retrospective review of its direct business transactions and identified potentially unsuitable transactions which collectively caused customers to pay \$116,390.58 in excessive sales charges. ([FINRA Case #2020065136101](#))

### **ACS Execution Services, LLC ([CRD #17972](#), Red Bank, New Jersey)**

June 10, 2024 – An AWC was issued in which the firm was censured, fined \$250,000, and required to certify that it has remediated the issues identified in the AWC and implemented a reasonably designed supervisory system, including written supervisory procedures (WSPs). Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to obtain locates for short sale orders as required by Rule 203(b)(1) of Regulation SHO. The findings stated that the firm incorrectly believed that it could rely on a broker-dealer client's locate when effecting a short sale for its own account to facilitate net trading. As a result, the firm effected at least 10 million short sales for its own account to facilitate short sale orders on a net basis without borrowing the securities, entering into a bona fide arrangement to borrow the securities, or having reasonable grounds to believe the securities could be borrowed so that they could be delivered on the date delivery was due. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to achieve compliance with Rule 203(b)(1) of Regulation SHO. The firm's WSPs incorrectly indicated that the firm could rely on a broker-dealer client's locate when facilitating a client order through a separate principal order for the firm's account. Although the firm required its broker-dealer clients to represent they obtained a locate, it did not implement any other supervisory system, surveillance, or review to monitor its compliance with or application of the locate requirement of Rule 203(b)(1). ([FINRA Case #2018057929601](#))

## Reported for August 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](http://www.finra.org/disciplinaryactions) to search for cases using key words or phrases, specified date ranges or other criteria.

**TradeZero America, Inc. ([CRD #282940](#), Brooklyn, New York)**

June 10, 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 its influencer communications were not fair and balanced and included exaggerated and promissory statements. The findings stated that the firm paid several influencers to promote it on social media platforms, including one influencer whose platforms had millions of viewers. The influencers' social media posts were retail communications of the firm. The influencers created social media posts promoting the firm that were not fair and balanced, as they did not discuss the risks of investing. The posts also contained exaggerated and promissory statements. The influencers also posted communications that claimed that the firm was a "free web trading platform," without disclosing that certain fees may apply or providing a prominent link to the firm's fee schedule, or failed to disclose that the posts were advertisements. The findings also stated that the firm failed to review the influencers' posts about the firm and failed to preserve records of the posts. The firm did not have an appropriately qualified registered principal approve influencers' videos prior to their publication and did not review influencers' posts made in online interactive electronic forums. The firm also did not maintain records of influencers' posts or the dates they were used. The findings also included that the firm failed to establish, maintain, and enforce a reasonably designed supervisory system, including WSPs, for the influencers' retail communications. The firm's WSPs did not require any principal to review and approve videos created by influencers prior to posting and did not have any system to review and approve the videos prior to posting. The firm's WSPs also did not require review and supervision of its influencers' posts made in online interactive electronic forums in the same manner as the firm reviewed and supervised correspondence. The firm also did not reasonably supervise its retail communications posted by influencers for compliance with FINRA Rule 2210(d) (1). Furthermore, the firm did not establish or maintain a supervisory system or procedures to preserve records of influencers' videos or their dates of use. The firm has since revised its supervisory system, including its WSPs, to, among other things, require a registered principal of the firm to review and approve all influencers' social media communications promoting the firm prior to use and to preserve records of such communications and their dates of use. FINRA found that the firm provided inaccurate privacy notices to firm customers. At the time of account opening, the firm provided each customer a privacy notice that stated, in part, that it discloses nonpublic personal information only when it is both permitted by law and required for the ordinary course of business. However, the privacy notice failed to state that the firm might share customers' nonpublic personal information with third parties for marketing purposes. Therefore, the firm failed to disclose to customers the categories of nonpublic personal customer information it would disclose, and the non-affiliated third parties to whom it would disclose that information. The firm updated its privacy notice to correct the inaccuracy. ([FINRA Case #2021072581301](#))

**GlobalLink Securities, Inc. ([CRD #29721](#), Pasadena, California)**

June 11, 2024 – An AWC was issued in which the firm was censured, fined \$200,000, ordered to pay \$397,862.20, plus interest, in restitution to customers, and required to retain an independent consultant to conduct a comprehensive review of the adequacy of the firm's compliance with applicable laws, regulations, and rules concerning fixed-income trading activities, including but not limited to compliance with FINRA Rules 5310 and 2121 and supervision of fixed income trading. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it charged unfair markups and markdowns in corporate bond transactions. The findings stated that the firm charged markups or markdowns ranging from 2.30 percent to, in one instance, 9.34 percent. The firm did not incur the costs of executing the trades as its clearing firm executed the transactions and charged separate markups and markdowns for those services. As a result, the firm's customers paid unfair markups and markdowns of \$397,862.20. The findings also stated that the firm failed to use reasonable diligence to obtain best execution. The firm did not execute transactions directly with the market but routed all its customers' fixed-income transactions to its clearing firm. The firm performed no diligence to determine whether it was buying or selling corporate bonds in the best market so that the resultant prices were as favorable to its customers as possible under prevailing market conditions. The findings also included that the firm failed to establish and maintain a supervisory system reasonably designed to achieve compliance with FINRA rules governing fair pricing and best execution of corporate obligations. With respect to compliance with FINRA Rule 2121, the firm's WSPs allowed markups and markdowns of up to a certain percentage of the transaction. That cap was not reasonable for most corporate bonds, and the firm had no procedures to identify exceptions or evaluate whether markups and markdowns below the cap were reasonable under the circumstances. For best execution, the firm lacked a reasonable system for supervising the execution quality of its corporate bond transactions, and its WSPs failed to designate the persons responsible for compliance with FINRA Rule 5310. ([FINRA Case #2021070607401](#))

**Kepler Capital Markets, Inc. ([CRD #139148](#), New York, New York)**

June 18, 2024 – An AWC was issued in which the firm was censured and fined \$475,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it overstated its advertised trade volume on a private, subscription-based provider of market data. The findings stated that the firm configured its systems to automatically advertise throughout the day its trading volume in numerous securities through the provider. The firm executed trades in U.S.-listed securities for its parent company. When the parent company accepted orders from customers, the orders were "high-touch" because its traders manually determined how the orders were executed but, once the orders were sent to the firm for execution, they were "low-touch" because it executed these orders on an automated basis. Following a change in the provider's processes, the firm

modified its system to split its trade volume advertising between high-touch and low-touch orders. As part of the modification, the firm implemented an end-of-day reconciliation process to correct for any differences between its intra-day advertised volume and its end-of-day executed volume resulting from order modifications and cancellations. Due to a misconfiguration in the end-of-day reconciliation process, the firm mistakenly advertised the orders it received from the parent company twice—once as high-touch volume and once as low-touch volume—causing the firm to double-count its advertised orders from the parent company. Subsequently, the firm remediated the misconfiguration. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to achieve compliance with FINRA Rule 5210. When the firm modified its systems to split its trade volume advertising between high-touch and low-touch orders, it did not reasonably test whether its trade volume data was accurately communicated to the provider. In addition, the firm failed to conduct reasonable reviews to ensure that it accurately communicated its trade volume data. The firm conducted intra-day reviews of its advertised trade volume by comparing, in real-time, the trade volume communicated to the provider against the trade volume reflected in the firm's order management system. However, this review was not reasonably designed because it could not detect errors that occurred during the end-of-day reconciliation process. The firm had no supervisory system or WSPs to determine whether it was accurately reporting its trade volume to the provider through its end-of-day reconciliation process. Subsequently, the firm implemented a review that assesses the accuracy of its trade volume advertising after the end-of-day reconciliation process is complete and, ultimately, the firm updated its WSPs to include a description of this review. ([FINRA Case #2022075863301](#))

**Mutual Securities, Inc. ([CRD #13092](#), Camarillo, California)**

June 21, 2024 – An AWC was issued in which the firm was censured and fined \$50,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it included impermissible confidentiality language in three settlement agreements with customers. The findings stated that one of the settlement agreements required a court order, order or rule of a regulatory agency for the customer to disclose the terms of the settlement to FINRA or other regulatory authorities. Another settlement agreement contained a broad confidentiality provision that did not expressly authorize the customer to respond without restriction or condition, to any inquiry about the settlement or its underlying facts by any securities regulator. A third agreement, while permitting disclosure to FINRA, did not permit disclosure to one specified department within FINRA. Accordingly, the three agreements contained confidentiality provisions that had the potential to impede regulatory investigations, and which otherwise failed to expressly allow customers to communicate, without restriction, with FINRA or other regulators. ([FINRA Case #2022073966101](#))

**Steward Partners Investment Solutions, LLC fka Umpqua Investments, Inc.**  
**([CRD #1254](#), Portland, Oregon)**

June 21, 2024 – An AWC was issued in which the firm was censured and fined \$225,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to reasonably supervise the transmittal of customer funds through externally initiated Automated Clearing House (ACH) transfers by third parties. The findings stated that \$332,457.73 was transferred out of a senior trust customer's brokerage account at the firm via externally initiated ACH transfers without the customer's knowledge or permission. The transfers were initiated by third parties who had illegally obtained information relating to a checking feature attached to the customer's account. The ACH requests originated from over 30 different external accounts, under different names, at approximately 30 different financial institutions and were nearly all used to pay credit card bills of third parties unrelated to the customer. The fraudulent transfers were discovered after the firm's clearing firm alerted it that there were insufficient funds to process an ACH. At the time of the fraudulent transfers, the firm did not maintain a system reasonably designed to review and monitor ACH transfers initiated by an external financial institution. The firm supervised ACH transfers using a proprietary tool offered by its clearing firm to flag suspicious ACH activity in customer accounts. However, the tool only monitored internally initiated ACH transfers and not ACH transfer requests received from an external financial institution. Accordingly, none of the transfers from the customer's account were flagged by the tool. The firm was unaware that the proprietary tool did not monitor all types of ACH transfers. In addition, the firm failed to identify or investigate several red flags relating to the transfers from the customer's account. A registered representative of the firm considered potential investment opportunities for the account using an end-of-year account report generated a month earlier, which reflected five fraudulent ACH transactions. The representative did not identify the transactions during his review of the report. By the time of the representative's review the following month, approximately \$31,000 had been transferred out of the account in ACH transactions. After discovery of the fraud, the firm worked with its clearing firm to create a new exception report and subsequently had changed its systems to begin reviewing externally initiated ACH transfers. The firm also conducted a lookback review to determine whether other customers had likewise been the victims of fraud. Subsequently, the bank processing the ACH transfers credited all of the stolen funds back to the customer. ([FINRA Case #2020066397201](#))

**SP Securities LLC ([CRD #130560](#), Houston, Texas)**

June 25, 2024 – An AWC was issued in which the firm was censured and fined \$20,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it violated Section 15(c)(2) of the Securities Exchange Act of 1934 (Exchange Act) and Rule 15c2-4 thereunder by failing to use an escrow account to custody customer funds. The findings stated that the firm acted

as the placement agent for two contingency offerings on behalf of separate issuers that were affiliated with a registered representative of the firm. The firm raised approximately \$1.8 million in investor funds for one of the offerings and \$4 million in investor funds for the other offering. The firm, which operated with a minimum net capital requirement of less than \$250,000, deposited the investor funds for both offerings into accounts that its registered representative established and controlled, rather than with a bank that had agreed in writing to hold the funds in escrow. The firm released the customer funds to the issuers or, when requested, returned the funds to customers. The findings also stated that the firm willfully violated Section 10(b) of the Exchange Act and Rule 10b-9 thereunder by failing to promptly return customer funds when the contingency was not met and changing material terms in one of the offerings. The offering required that the issuer raise a minimum of \$3.5 million by March 31, 2020. The firm raised approximately \$1.8 million from investors by March 2020. As the closing date approached, the firm and the issuer agreed to restructure the transaction. The firm, however, did not terminate the offering and return investor funds when the deal was restructured, or when \$3.5 million had not been raised by the close date. Instead, the firm offered to return investor funds to those who declined to participate in the new transaction with one investor accepting this offer and another investor reducing their investment amount. The firm held the remaining investor funds in the bank account until they were used to fund an agreed-upon restructured transaction. ([FINRA Case #2021069304501](#))

## Individuals Barred

### Imdadur Rahman ([CRD #2476187](#), Clarkston, Michigan)

June 10, 2024 – An AWC was issued in which Rahman was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Rahman consented to the sanction and to the entry of findings that he facilitated a senior customer's designation of Rahman's wife as a beneficiary on two of the customer's accounts. The findings stated that the customer was not Rahman's family member and Rahman failed to provide written notice to his member firm of the customer's designation of Rahman's wife as beneficiary. The findings also stated that Rahman falsified the customer's beneficiary forms by identifying his wife as the customer's niece. Rahman engaged in this conduct to prevent his firm from identifying the designation of his wife as a prohibited beneficiary designation. The findings also included that Rahman engaged in an undisclosed outside business activity (OBA) by providing certain services to the customer such as buying furniture, groceries, and clothing, driving him to appointments, and sending his mail to his relative. Rahman told the customer and the relative that he could not be compensated for these services directly, but instead directed them to write checks to Rahman's wife, which they did, totaling at least \$116,000. Rahman did not provide prior written notice to or receive approval from his firm for his OBA. FINRA found that Rahman accepted gifts from the customer in circumvention of firm policy. In addition to the monetary compensation Rahman received from the

customer through his wife, he also accepted monetary gifts from him via payments from the customer to vendors and credit card companies on Rahman's behalf. Rahman repeatedly told the customer about his outstanding bills and accepted the customer's payment of those bills totaling more than \$47,000. Rahman failed to disclose these gifts to the firm and falsely stated on compliance questionnaires that he had not received unreported gifts. ([FINRA Case #2023080253301](#))

**Trevor Michael Saliba ([CRD #2692057](#), Beverly Hills, California)**

June 10, 2024 – A Securities and Exchange Commission (SEC) remand decision became final in which Saliba 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 sanctions were based on findings that Saliba provided false documents to FINRA in an effort to convince it to reverse the denial of a continuing membership application filed by a member firm he owned. The findings stated that Saliba subsequently produced the same false documents to FINRA in response to a request for documents. For these violations, the SEC agreed with FINRA's determination at Saliba's misconduct demonstrated dishonesty and a lack of integrity and thus a bar was the appropriate sanction. The findings also stated that the SEC sustained a separate bar imposed on Saliba for failing to produce all his business computers and testifying falsely during on-the-record testimony about his use of computers for business. In sustaining the bar, the SEC agreed that Saliba's misconduct demonstrated an inability to comply with regulatory rules and raised serious investor protection concerns. ([FINRA Case #2013037522501](#))

**Rosaline Alam ([CRD #5742202](#), Yorba Linda, California)**

June 11, 2024 – An AWC was issued in which Alam was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Alam 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 into the circumstances surrounding a Uniform Termination Notice for Securities Industry Registration (Form U5) amendment filed by her member firm. The findings stated that the Form U5 amendment disclosed that the firm had received allegations that Alam misappropriated funds from an elderly client and, in violation of company policy, had been named a beneficiary in the client's will. ([FINRA Case #2023080454101](#))

**Collins Bhola ([CRD #6533629](#), Lindenhurst, New York)**

June 13, 2024 – An AWC was issued in which Bhola was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Bhola consented to the sanction and to the entry of findings that he refused to provide on-the-record testimony requested by FINRA in connection with its investigation into the facts described in a Rule 4530 filing made by a member firm. ([FINRA Case #2023079727201](#))

**Ronnie Rindon Dumag ([CRD #4783585](#), Sacramento, California)**

June 13, 2024 – An AWC was issued in which Dumag was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Dumag consented to the sanction and to the entry of findings that he refused to produce information and documents requested by FINRA in connection with its investigation into his potential conversion of funds from an elderly customer. ([FINRA Case #2024081781101](#))

**Amber Rose Lewis ([CRD #7799664](#), Haughton, Louisiana)**

June 14, 2024 – An AWC was issued in which Lewis was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Lewis consented to the sanction and to the entry of findings that she fabricated documents that she provided to her member firm, falsely representing that she passed the FINRA Securities Industry Essentials (SIE) exam. The findings stated that Lewis took and failed the SIE exam. In response to the firm's request for a copy of her SIE score report, Lewis provided the firm with a falsified report she had created, stating that she passed the exam. The firm thereafter filed an initial Uniform Application for Securities Industry Registration or Transfer (Form U4) on her behalf. Ultimately, the firm approached Lewis for an explanation after it received notice that she failed the SIE exam. In response, Lewis provided the firm with a series of emails she fabricated, including emails she purportedly sent to and received from test administrators, falsely indicating that the failing score belonged to another person and that she passed the exam. Lewis also provided the firm with an email she fabricated, falsely reflecting that she notified FINRA of the conflicting score reports. The findings also stated that Lewis provided false and misleading information to FINRA after it served her with requests seeking information regarding her SIE exam. In response to these requests, Lewis falsely stated that she received a passing score and that she worked with test administrators to resolve her conflicting scores. ([FINRA Case #2023080603401](#))

**Devin Lamarr Wicker ([CRD #4228250](#), New York, New York)**

June 20, 2024 – Wicker appealed an SEC decision to the US Court of Appeals for the District of Columbia Circuit. Wicker was barred from association with any FINRA member in all capacities and ordered to pay \$50,000, plus interest, in restitution to a customer. The SEC sustained the findings and sanctions imposed by the NAC, and rejected Wicker's arguments that the entire proceeding should have been dismissed. The sanctions were based on the findings that Wicker converted a customer's funds. The findings stated that the customer hired Wicker's member firm to serve as the underwriter for its anticipated public offering and transferred \$50,000 to the firm for the sole purpose of paying a retainer to a law firm, but Wicker used the funds for other purposes. Wicker never used these or any other funds to pay the law firm, and he never returned the funds to the customer, even though he received at

least seven written requests from the customer and the law firm to do so. Instead, after the customer wired the \$50,000 to the firm's bank account, essentially all of that account's funds were used to pay the firm's other expenses. Wicker controlled the firm's bank account into which the retainer was wired, and he authorized withdrawals and payments from the account for other purposes, including substantial payments to himself. To date, Wicker has not repaid the customer or sent the money to the law firm.

The bar is in effect pending review. ([FINRA Case #2016052104101](#))

**Austin Richard Dutton Jr. ([CRD #2739167](#), Furlong, Pennsylvania)**

June 24, 2024 – An Office of Hearing Officers (OHO) decision became final in which Dutton was barred from association with any FINRA member in all capacities and ordered to pay to FINRA disgorgement of commissions received in the amount of \$65,509, plus prejudgment interest. The sanctions were based on the findings that Dutton recommended customers, most of whom were retired or approaching retirement, purchase illiquid alternative investments without having a reasonable basis to believe such investments were suitable for the customers. The findings stated that Dutton recommended that the customers purchase \$1.2 million in alternative investments. These recommendations generated \$72,789 in commissions for Dutton and his member firm. Dutton's recommendations were unsuitable based on the customers' investment profile, including their net worth, investable assets, annual income, investment objective, and risk tolerance. The findings also stated that Dutton falsified books and records of his firm and caused these books and records to contain inaccurate information about his customers' net worth, risk tolerance, investment objective, and concentration percentage in alternative investments. Dutton falsified documents, including new account documents, Suitability Forms, Direct Business Profile and Agreements, and Accredited Investor Forms. The findings also included that Dutton failed to respond or timely respond to FINRA's requests for information and documents in connection with its investigation into his sale of alternative investments, and in connection with a separate investigation into whether he had failed to disclose his participation in a private securities transaction. In connection with the investigation into Dutton's sale of alternative investments, Dutton did not respond to the requests until after the initiation and near-completion of an expedited FINRA Rule 9552 proceeding that would have led to a bar from associating with any FINRA member firm if he failed to comply. In connection with the other investigation, Dutton stated in a phone call with FINRA that he would consider responding to this request. Yet Dutton did not request an extension of time to respond, and he failed to respond to the request. Accordingly, FINRA sent out another request stating that Dutton's failure to respond could result in disciplinary action, including a bar from associating with any FINRA member firm. Dutton left a voicemail with FINRA about the requests yet failed to respond with the requested documents and information. ([FINRA Case #2018059178401](#))

**Bryan Noonan ([CRD #4864372](#), Scottsdale, Arizona)**

June 24, 2024 – An AWC was issued in which Noonan was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Noonan consented to the sanction and to the entry of findings that he refused to produce information and documents requested by FINRA in connection with its investigation into whether he engaged in undisclosed OBAs and private securities transactions. ([FINRA Case #2024081517201](#))

**Thomas Reyes ([CRD #3168338](#), La Vista, Nebraska)**

June 24, 2024 – An AWC was issued in which Reyes was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Reyes 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 giving rise to Form U5 amendments filed by his member firm. The findings stated that the first Form U5 amendment disclosed an internal review concerning potential undisclosed OBAs by Reyes and a second amendment disclosed that the internal review concluded that he sold annuities that were not on the firm's approved product list away from the firm. ([FINRA Case #2022074794901](#))

## Individuals Suspended

**Rod Charles Dayton ([CRD #729831](#), Sayville, New York)**

June 3, 2024 – An AWC was issued in which Dayton was fined \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Dayton consented to the sanctions and to the entry of findings that he certified to the State of New York that he had personally completed 18 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 July 1, 2024, through July 31, 2024.  
([FINRA Case #2024081402501](#))

**James W. Pruitt II ([CRD #5808107](#), Sayville, New York)**

June 3, 2024 – An AWC was issued in which Pruitt was fined \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Pruitt 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 July 1, 2024, through July 31, 2024.  
([FINRA Case #2024081405401](#))

**Brad H. Davidoff ([CRD #4860150](#), Rockville Centre, New York)**

June 5, 2024 – An AWC was issued in which Davidoff was fined \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Davidoff 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 July 1, 2024, through July 31, 2024.

([FINRA Case #2023079709601](#))

**Marvin Somlo ([CRD #6617205](#), Rolling Meadows, Illinois)**

June 12, 2024 – An AWC was issued in which Somlo was fined \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Somlo consented to the sanctions and to the entry of findings that he caused his member firm to maintain incomplete books and records by using electronic messaging services that were not permitted under the firm's Electronic Systems Telecommunication Policy. The findings stated that Somlo exchanged more than 1,000 communications with customers and prospective customers regarding securities-related business via text message and other electronic messaging platforms that were not permitted by his firm's policy. These electronic communications included discussions of specific investments and their terms, market updates, and offers to make investor introductions. Certain of Somlo's messages concerned Initial Public Offerings (IPOs) for small-cap issuers and other potentially high-risk investments. Somlo's misconduct caused his firm not to capture or maintain these communications.

The suspension was in effect from July 1, 2024, through July 31, 2024.

([FINRA Case #2022073421501](#))

**Todd Matthew Themistocles ([CRD #4494773](#), Livermore, California)**

June 14, 2024 – An AWC was issued in which Themistocles was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for 18 months. Without admitting or denying the findings, Themistocles consented to the sanctions and to the entry of findings that he possessed and had access to unauthorized materials while taking the Series 65 Uniform Investment Adviser Law Examination, a North American Securities Administrators Association (NASAA) qualification exam. The findings stated that prior to beginning the exam, Themistocles attested that he read and would abide by the NASAA Qualification Examinations Rules of Conduct. However, Themistocles possessed and had access to personal notes during a three-minute, unscheduled bathroom break, in violation of the Rules of Conduct.

The suspension is in effect from July 15, 2024, through January 14, 2026.

([FINRA Case #2023079624801](#))

**Kurt Allen Berry (CRD #4550773, Johnson City, Tennessee)**

June 17, 2024 – An AWC was issued in which Berry was assessed a deferred fine of \$5,000, suspended from association with any FINRA member in all capacities for six months, and ordered to pay deferred disgorgement of financial benefits received in the amount of \$8,000, plus interest. Without admitting or denying the findings, Berry consented to the sanctions and to the entry of findings that he participated in private securities transactions involving customers without providing prior written notice to his member firms or receiving approval from them. The findings stated that Berry's customers invested \$517,410 in oil and gas wells through a series of securities offerings. The customers were all either pre-existing clients or family members of existing clients of Berry's advisory firm. Berry met with and made each customer aware of the oil and gas securities offerings, discussed the investments with each customer, and introduced each customer to a colleague who had visited some of the oil and gas wells to conduct due diligence. Berry received \$2,000 in compensation for each of the customers, totaling \$8,000.

The suspension is in effect from June 17, 2024, through December 16, 2024.  
([FINRA Case #2023080473501](#))

**John Francis Coleman (CRD #2251163, New Hyde Park, New York)**

June 17, 2024 – An AWC was issued in which Coleman was fined \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Coleman 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 July 15, 2024, through August 14, 2024.  
([FINRA Case #2023079716901](#))

**Nicholas A. Marchelos (CRD #5957506, Massapequa, New York)**

June 17, 2024 – An AWC was issued in which Marchelos was fined \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Marchelos 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 July 15, 2024, through August 14, 2024.  
([FINRA Case #2023079717701](#))

**Scott Peter Mullady (CRD #2190133, Fort Salonga, New York)**

June 17, 2024 – An AWC was issued in which Mullady was fined \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Mullady 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 July 15, 2024, through August 14, 2024.  
([FINRA Case #2023079718001](#))

**Nathaniel Walter Adams (CRD #5703267, Winter Haven, Florida)**

June 18, 2024 – An AWC was issued in which Adams 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, Adams consented to the sanctions and to the entry of findings that he improperly removed customers' nonpublic information without his member firm's or the customers' consent and in contravention of the firm's procedures. The findings stated that in anticipation of leaving the firm, Adams emailed an unencrypted spreadsheet containing nonpublic personal information of approximately 2,300 customers to a family member's email account and then emailed the spreadsheet to a contact at his prospective new firm. After Adams resigned from the firm, it discovered the email and attached spreadsheet that contained customers' nonpublic personal information, and informed Adam's new firm of its discovery. The nonpublic personal customer information was deleted following reviews of all devices and email accounts.

The suspension is in effect from July 1, 2024, through August 31, 2024.  
([FINRA Case #2022076599501](#))

**Roxanne Felecia Campbell (CRD #4424325, Hoboken, New Jersey)**

June 18, 2024 – An AWC was issued in which Campbell was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for five months. Without admitting or denying the findings, Campbell consented to the sanctions and to the entry of findings that she willfully failed to timely amend her Form U4 to disclose a non-investment related material reportable event that was required to be disclosed. The findings stated that Campbell's Form U4 was amended to make an unrelated disclosure, but the amendment did not include the non-investment related material event.

The suspension is in effect from July 15, 2024, through December 14, 2024.  
([FINRA Case #2022074492501](#))

**Aurel Davina Anderson ([CRD #6573760](#), Allston, Massachusetts)**

June 20, 2024 – An AWC was issued in which Anderson was assessed a deferred fine of \$10,000, suspended from association with any FINRA member in all capacities for two months, and suspended from association with any FINRA member in any principal capacity for two months. The suspensions will run consecutively. Without admitting or denying the findings, Anderson consented to the sanctions and to the entry of findings that she failed to reasonably supervise her member firm's communications with the public. The findings stated that Anderson, as the firm's president, reviewed and approved the firm's retail communications concerning two new programs the firm began offering, a Cash Program and a Stock Loan Program. Anderson's approval of these retail communications, which were materially false and misleading, was unreasonable. Although Anderson knew that funds deposited into the Cash Program constituted an unsecured loan to a firm affiliate that lacked FDIC insurance or SIPC protection, and that any funds deposited were subject to the risk of complete loss, she nevertheless approved the firm's communications which failed to adequately disclose those facts. Similarly, Anderson knew that customers enrolled in the Stock Loan Program could lose their rights to dividends and other distributions if their shares were borrowed, but she did not ensure that those facts were adequately explained in the firm's communications concerning that program. The findings also stated that Anderson provided an altered and misleading document to FINRA concerning the firm's Customer Identification Program (CIP). In connection with a FINRA examination of the firm, FINRA requested copies of the firm's written procedures for its CIP applicable to foreign customers. In response, Anderson provided FINRA with written procedures on behalf of the firm that contained identity verification provisions for foreign customers that purportedly went into effect in February 2020. However, the firm had no such written procedures in place until after that date. Anderson altered an incomplete draft of the procedures to give the false impression that the firm had implemented them in February 2020.

The suspension in all capacities is in effect from July 1, 2024, through August 31, 2024. The suspension in any principal capacity will be in effect from September 1, 2024, through October 31, 2024. ([FINRA Case #2021069382401](#))

**Gregg William Gravenstine ([CRD #1762521](#), Medford, New Jersey)**

June 20, 2024 – An AWC was issued in which Gravenstine was fined \$10,000 and suspended from association with any FINRA member in all capacities for 45 days. Without admitting or denying the findings, Gravenstine consented to the sanctions and to the entry of findings that he made unauthorized transactions by executing cash journals, totaling \$24,109, from a customer's account to an account owned by the customer's father. The findings stated that Gravenstine made these transfers based on instructions from the customer's father even though he was not authorized to direct transactions in the customer's account. Gravenstine relied on the customer's father's indication that he had spoken with his son regarding the journals. The customer eventually commenced a dispute resolution proceeding to dispute the legitimacy of the transactions. The customer's father subsequently paid the customer the amounts journaled from the customer's account to the father's

account. The findings also stated that Gravenstine caused his member firm to maintain incomplete books and records by communicating with firm customers regarding firm-related business via text messages from his personal phone. The text messages were not reviewed or retained by the firm.

The suspension is in effect from July 15, 2024, through August 28, 2024.  
([FINRA Case #2022073972401](#))

**Ronald Gene Chronister ([CRD #3255653](#), Derby, Kansas)**

June 21, 2024 – An AWC was issued in which Chronister was fined \$7,500 and suspended from association with any FINRA member in all capacities for 45 days. Without admitting or denying the findings, Chronister consented to the sanctions and to the entry of findings that he effected an unauthorized trade in a deceased customer's account. The findings stated that Chronister's brokerage customer passed away after being hospitalized for several weeks. Unaware of the customer's death, Chronister effected the trade in the customer's account to fund the customer's upcoming required minimum distribution. Later that day, Chronister learned of the customer's death. Subsequently, Chronister falsely stated in an email to his member firm that he had spoken with the customer earlier in the month about the trade.

The suspension is in effect from July 15, 2024, through August 28, 2024.  
([FINRA Case #2022075350201](#))

**Lauren Catherine McNeill ([CRD #5674219](#), Riverhead, New York)**

June 21, 2024 – An AWC was issued in which McNeill was fined \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, McNeill 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 was in effect from July 15, 2024, through August 14, 2024.  
([FINRA Case #2024081405101](#))

**Alan Neil Lichtenstein ([CRD #1877017](#), Lake Grove, New York)**

June 24, 2024 – An AWC was issued in which Lichtenstein was fined \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Lichtenstein 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 July 15, 2024, through August 14, 2024.  
([FINRA Case #2023079718101](#))

**Steve Allen Moise ([CRD #4995443](#), Bayside, New York)**

June 24, 2024 – An AWC was issued in which Moise was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for five months. Without admitting or denying the findings, Moise consented to the sanctions and to the entry of findings that he willfully violated the Care Obligation of Rule 15l-1 of the Exchange Act (Regulation Best Interest) by recommending a series of transactions in a customer's account that was excessive and not in the customer's best interest. The findings stated that Moise recommended that the customer execute 199 trades in the account over several months. On several occasions, Moise recommended that the customer sell a security shortly after purchasing it. The customer suffered realized losses and paid more than \$52,000 in commissions and trading costs. Moise's member firm settled with the customer through mediation.

The suspension is in effect from July 1, 2024, through November 30, 2024.

([FINRA Case #2022073708202](#))

**Katelyn Rae Cordido Reese ([CRD #6516916](#), Mars, Pennsylvania)**

June 25, 2024 – An AWC was issued in which Cordido Reese was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for 16 months. Without admitting or denying the findings, Cordido Reese consented to the sanctions and to the entry of findings that she falsified documents and violated a firm policy designed to protect customers by placing her personal bank account information on life insurance applications for non-family-member customers. The findings stated that Cordido Reese paid a total of \$30,366.80 in life insurance premiums for non-family-member customers. Once Reese paid the initial premium on these policies, she received advanced sales commissions from the insurance company she worked as an agent for. Ultimately, either the insurance company or the customers canceled most of the policies. In certain cases, the customers chose to keep the policies, but changed the payment method to their personal bank account. When Cordido Reese resigned from her member firm and the insurance company, she owed a balance of approximately \$144,000, comprised primarily of advanced sales commissions for the canceled policies. Cordido Reese has since entered into a payment plan with the insurance company's collection department to pay back the money she owes.

The suspension is in effect from July 1, 2024, through October 31, 2025.

([FINRA Case #2022077202301](#))

**Jeffrey Dattilo ([CRD #6803224](#), Clark, New Jersey)**

June 25, 2024 – An AWC was issued in which Dattilo 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, Dattilo consented to the sanctions and to the entry of findings that after taking and passing the Certified Financial Planner (CFP) exam, Dattilo disclosed exam content and questions to other

individuals who planned to take the exam, in violation of the CFP Board testing rules. The findings stated that Dattilo exchanged this information through a group messaging platform, text message, and over the telephone. Subsequently, the CFP Board's Disciplinary and Ethics Commission (DEC) found that Dattilo engaged in exam misconduct and violated its Pathway Agreement, which prohibits exam misconduct before, during, and after exam administration. The DEC imposed a five-year bar on Dattilo from applying for or obtaining the CFP certification, voided his exam results and ordered him to complete 100 hours of continuing education credit. 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 July 1, 2024, through July 31, 2024.

([FINRA Case #2022075915101](#))

**Thomas Nguyen ([CRD #3092480](#), Rye, New York)**

June 26, 2024 – An AWC was issued in which Nguyen was assessed a deferred fine of \$7,500 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Nguyen consented to the sanctions and to the entry of findings that he opened and maintained outside brokerage accounts without disclosing or receiving prior approval from his member firm, and without notifying the executing financial institutions of his association his firm. The findings stated that Nguyen was required to sign and submit regular compliance affirmations disclosing to his firm any outside brokerage accounts, but he failed to disclose these outside brokerage accounts in 12 such compliance affirmations. Furthermore, Nguyen's undisclosed outside accounts, all of which were actively managed by outside advisors, executed trades that were on his firm's restricted trading list. The findings also stated that Nguyen failed to disclose OBAs to his firm. Nguyen and his wife were co-owners and members or governors of three limited liability companies that were actively conducting business activities that Nguyen was required to disclose to his firm. In addition, Nguyen was required to sign and submit regular compliance affirmations disclosing his OBAs to his firm, but he did not include these entities in 16 such compliance affirmations.

The suspension is in effect from July 1, 2024, through September 30, 2024.

([FINRA Case #2022075393201](#))

**Azmi Sharif ([CRD #6481342](#), Downers Grove, Illinois)**

June 26, 2024 – An AWC was issued in which Sharif was fined \$5,000 and suspended from association with any FINRA member in all capacities for nine months. Without admitting or denying the findings, Sharif consented to the sanctions and to the entry of findings that he participated in private securities transactions by facilitating the investment of approximately \$900,000 by eight individuals, including seven customers of his member firm, without providing

prior written notice to his firm. The findings stated that Sharif was a founding investor and employee in a crypto asset mining company. Sharif and his business partner held an approximately one-hour video call with four firm customers to explore a potential investment by the customers in the company. During the call, Sharif explained the business model of the company, the amount the company was hoping to raise, the minimum investment, potential returns, and answered questions relating to the company. Subsequently, the customers and four of their family members, three of whom were also firm customers, collectively invested approximately \$900,000 in securities. The investments were for, among other things, the purchase of crypto asset mining equipment. Before the company was able to reach its funding goal, it changed its business model, and the customers complained to the firm. All seven customers either received refunds from, or otherwise settled with, the issuer. Sharif received no selling compensation in connection with his participation in the transactions.

The suspension is in effect from July 15, 2024, through April 14, 2025.

[\(FINRA Case #2022076175702\)](#)

**Sharif Azmi Sharif ([CRD #2343413](#), Downers Grove, Illinois)**

June 26, 2024 – An AWC was issued in which Sharif was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for nine months. Without admitting or denying the findings, Sharif consented to the sanctions and to the entry of findings that he participated in private securities transactions by facilitating the investment of approximately \$900,000 by eight individuals, including seven customers of his member firm, without providing prior written notice to his firm. The findings stated that Sharif was a founding investor in a crypto asset mining company. Sharif and his business partner held an approximately one-hour video call with four firm customers to explore a potential investment by the customers in the company. During the call, Sharif explained the business model of the company, the amount the company was hoping to raise, potential returns, and answered questions relating to the company. Subsequently, the customers and four of their family members, three of whom were also firm customers, collectively invested approximately \$900,000 in securities. The investments were for, among other things, the purchase of crypto asset mining equipment. Before the company was able to reach its funding goal, it changed its business model, and the customers complained to the firm. All seven customers either received refunds from, or otherwise settled with, the issuer. Sharif received no selling compensation in connection with his participation in the transactions.

The suspension is in effect from July 1, 2024, through March 31, 2025.

[\(FINRA Case #2022076175701\)](#)

**Kalomira K. Zangoulos ([CRD #4451124](#), Macomb Township, Michigan)**

June 28, 2024 – An AWC was issued in which Zangoulos 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, Zangoulos consented to the sanctions and to the entry of findings that she falsified a personal bank account statement she submitted to her member firm pursuant to a heightened supervision plan (HSP). The findings stated that when Zangoulos associated with the firm, it conditioned her continued association on compliance with an HSP requiring her to, among other things, periodically submit copies of her personal bank account statements to the firm. Pursuant to the HSP, Zangoulos provided the firm an account statement for her personal bank account that she had altered to remove certain transactions, including charges for insufficient funds and a cash withdrawal at a casino. Zangoulos never informed the firm that she had altered the statement.

The suspension is in effect from July 1, 2024, through August 31, 2024.  
([FINRA Case #2022076731901](#))

## 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.

**Michael Richard Rosalia ([CRD #2323953](#), Blue Point, New York)**

June 20, 2024 – Rosalia was named a respondent in a FINRA complaint alleging that he failed to appear and provide on-the-record testimony requested by FINRA in connection with its investigation into whether he engaged in excessive and unsuitable trading in his customers' accounts. ([FINRA Case #2019060753508](#))

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

**Berchwood Partners LLC**  
(CRD #108399)  
New York, New York  
(June 20, 2024)

**Melvin Securities, L.L.C. (CRD #29767)**  
Chicago, Illinois  
(June 21, 2024)

**Securities Capital Corporation**  
(CRD #22892)  
Birmingham, Alabama  
(June 21, 2024)

**Tellson Securities (CRD #286665)**  
Jacksonville, Florida  
(June 20, 2024)

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**Firm Cancelled for Failure to Pay FINRA Dues, Fees and Other Charges Pursuant to FINRA Rule 9553**

**E1 Asset Management, Inc.**  
(CRD #46872)  
Jersey City, NJ  
(June 28, 2024)

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**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.)

**Berchwood Partners LLC**  
(CRD #108399)  
New York, New York  
(June 3, 2024)

**Berchwood Partners LLC**  
(CRD #108399)  
New York, New York  
(June 10, 2024)

**Bournehill Investment Services, Inc.**  
(CRD #104003)  
Uniondale, New York  
(June 10, 2024)

**Bournehill Investment Services, Inc.**  
(CRD #104003)  
Uniondale, New York  
(June 17, 2024)

**Chapwood Securities, Inc.**  
(CRD #154376)  
Plano, Texas  
(June 10, 2024)

**Chapwood Securities, Inc.**  
(CRD #154376)  
Plano, Texas  
(June 17, 2024)

**E1 Asset Management, Inc.**  
(CRD #46872)  
Jersey City, New Jersey  
(June 17, 2024)

**I-Bankers Direct, LLC (CRD #167533)**  
 Boca Raton, Florida  
 (June 12, 2024)  
 FINRA Case #20240820893/Expedited  
 Proceeding #FPI240004

**Melvin Securities, L.L.C. (CRD #29767)**  
 Chicago, Illinois  
 (June 3, 2024)

**Securities Capital Corporation  
 (CRD #22892)**  
 Birmingham, Alabama  
 (June 3, 2024)

**Securities Capital Corporation  
 (CRD #22892)**  
 Birmingham, Alabama  
 (June 10, 2024)

**Securities Capital Corporation  
 (CRD #22892)**  
 Birmingham, Alabama  
 (June 17, 2024)

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**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.)

**Ned Adam Seitler (CRD #2897661)**  
 Syosset, New York  
 (June 10, 2024)  
 FINRA Case #2023080050201

**Kirkland DeShannon Wilson  
 (CRD #7362834)**  
 Lockhart, Texas  
 (June 4, 2024)  
 FINRA Case #2023079881701

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**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.)

**Fanar Fawaz Almosleh (CRD #7521305)**  
 Carmichael, California  
 (June 10, 2024)  
 FINRA Case #2024081046501

**Zev Marten Bishop (CRD #5826058)**  
 Sarasota, Florida  
 (June 28, 2024)  
 FINRA Case #2023079377301

**Nicholas C. Camp (CRD #6365278)**  
 Columbus, Ohio  
 (June 3, 2024)  
 FINRA Case #2024081426901

**Jessica Lynn Cottee (CRD #6923343)**  
 Indianapolis, Indiana  
 (June 10, 2024)  
 FINRA Case #2024080887501

**Samuel Girgiss (CRD #6088898)**  
 Staten Island, New York  
 (June 10, 2024)  
 FINRA Case #2018056490312

**Vanessa Oliveira Hendrickson  
 (CRD #6997755)**  
 Coram, New York  
 (June 10, 2024)  
 FINRA Case #2023080788301

**Mariah Nagy (CRD #7317776)**  
 North Royalton, Ohio  
 (June 28, 2024)  
 FINRA Case # 2023078844701

**Zayed Azaji Rodriguez Regalado (CRD #6915438)**  
Stamford, Connecticut  
(June 3, 2024)  
FINRA Case #2023080305501

**Jeffery Bryant Sanders (CRD #6598339)**  
Union, South Carolina  
(June 17, 2024)  
FINRA Case #2024081360501

**Daniel James Turner (CRD #6279874)**  
Philadelphia, Pennsylvania  
(June 27, 2024)  
FINRA Case #2023079560601

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**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)

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**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.)**

**George Apolonides (CRD #3101928)**  
Brooklyn, New York  
(June 6, 2024)  
FINRA Arbitration Case #23-00013

**Gerald John Cocuzzo (CRD #4047511)**  
Delray Beach, Florida  
(April 19, 2024 – June 20, 2024)  
FINRA Arbitration Case #23-02119

**Howard Okeefe Graham (CRD #717332)**  
Madison, Mississippi  
(June 25, 2024)  
FINRA Arbitration Case #24-00216

**James Brett Stuart (CRD #3022149)**  
Castle Rock, Colorado  
(June 10, 2024)  
FINRA Arbitration Case #21-02925

**Kostas Tsamos (CRD #2782014)**  
Commack, New York  
(June 6, 2024)  
FINRA Arbitration Case #23-00013