

Disciplinary and Other FINRA Actions

Reported for
October 2025

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).

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Firm Fined, Individuals Sanctioned

Wilson-Davis & Co., Inc. ([CRD #3777](#), Salt Lake City, Utah), Byron Bert Barkley ([CRD #12469](#), Salt Lake City, Utah), and James C. Snow Jr. ([CRD #2761102](#), Salt Lake City, Utah)

August 7, 2025 – The firm and Barkley appealed a National Adjudicatory Counsel (NAC) decision to the Securities and Exchange Commission (SEC). The NAC decision in regard to Snow became final on August 11, 2025. The firm was fined \$490,000. Barkley was fined \$25,000, suspended in any principal capacities for six months, and required to requalify by examination as a General Securities Principal, Investment Banking Principal, and Compliance Officer before acting in those capacities again. Snow was fined \$50,000, suspended in any principal capacity for six months, and required to requalify as a General Securities Principal and Investment Banking Principal before acting in those capacities again. The NAC, on remand from the SEC for reconsideration of sanctions, modified the sanctions imposed. The sanctions are based on the findings that the firm engaged in short selling in violation of Rule 203(b)(1) of Regulation SHO of the Securities Exchange Act of 1934 (Reg SHO) because the firm failed to find locates for 122 short sale transactions effected in four low-priced stocks. The findings stated that the firm was not exempt from Reg SHO's locate requirement because it was not engaged in bona-fide market-making activities with respect to the stocks. The findings also stated that the firm, Snow, and Barkley failed to reasonably supervise short sales to ensure compliance with Reg SHO. The firm's written supervisory procedures (WSPs) provided no procedures for a supervisor to examine whether short sales were made in connection with bona-fide market-making activity, and the firm had no processes or procedures for locating or borrowing securities for its short sales. The findings also included that the firm and Snow failed to devise a reasonable system to supervise the firm's personnel. The firm's WSPs purported to make supervisory assignments through head count lists, but the head count lists were not circulated or finalized and were replete with erroneous lines of authority. FINRA found that the firm and Snow failed to follow the firm's procedures for heightened supervision. Snow waited one-and-a-half years after FINRA filed a

complaint against the firm and one of its representatives, one year after the firm and the representative settled a matter, and two months after a hearing panel found a representative had engaged in serious misconduct before considering the need to place the representative under heightened supervision. FINRA also found that the firm and Snow failed to supervise the review of instant messages. In addition, FINRA found that the firm and Snow failed to establish and implement anti-money laundering (AML) policies and procedures and conduct adequate AML training. The firm's AML procedures required firm employees to report suspicious activities to Snow and set forth a list of red flags for them to be aware of for that purpose. Snow testified that the firm purchased the AML procedures from a vendor and did not alter the generic list of red flags that came with it and as a result, the list was not tailored to AML risks of the firm's primary business of penny stock trading and penny stock liquidation.

The sanctions for the firm and Barkley are not in effect pending review.

Snow's suspension is in effect from September 15, 2025, through March 13, 2026. ([FINRA Case #2012032731802](#))

Firm Fined

D. Boral Capital LLC ([CRD #103792](#), New York, New York)

August 5, 2025 – A Letter of Acceptance, Waiver and Consent (AWC) was issued in which the firm was censured and fined \$125,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it conducted a securities business on 96 days while failing to maintain its minimum required net capital. The findings stated that in connection with 62 firm commitment underwritings, the firm attempted to use agreements to comply with its net capital responsibilities for these offerings, but the agreements did not meet the requirements set out in the interpretations. For 25 offerings, the firm entered into backstop agreements with broker-dealer counterparties that were not a member of the underwriting syndicate, which did not comply with the requirement set out in the interpretations that a backstop provider be a member of the underwriting syndicate. For the remaining offerings, the firm entered into "Agreement[s] Among Underwriters" that did not include any of the requirements set out in the interpretations, such as requiring the counterparty to deduct in its net capital computation any applicable open contractual commitment charges or unequivocally requiring the backstop provider to purchase unsold securities allocated to the backstop recipient. As a result, the firm retained its open contractual commitment and corresponding net capital obligations for the firm commitment underwritings. In addition, the firm failed to maintain its required minimum net capital on 34 additional days. These deficiencies resulted primarily from a firm principal making capital withdrawals and the misclassification of certain payments received by the firm as income, rather than deferred income. The firm conducted a securities business on each of the days that it was net capital deficient by engaging in investment banking related activities. The net capital deficiencies caused by these issues on these days ranged from approximately \$222,000 to \$765,000. The findings also stated that the firm failed to establish and maintain WSPs reasonably designed to achieve compliance with net capital requirements. The firm's WSPs regarding its financial and operational procedures did not specify how to perform net capital computations in connection with the firm's participation in firm commitment underwritings. Further, though the firm sought to use agreements with other broker-dealers as a means of

complying with the net capital requirements for such offerings, it did not maintain any WSPs pertaining to the use of such agreements or provide any guidance regarding the requirements of a valid backstop agreement. In addition, the firm failed to establish or maintain any WSPs related to capital withdrawals by owners of the firm to ensure that such withdrawals did not cause the firm to have insufficient net capital. The findings also included that the firm failed to file or timely file certain required corporate offering filings with FINRA in connection with its participation in public offerings. ([FINRA Case #2022074783101](#))

Odeon Capital Group LLC ([CRD #148493](#), New York, New York)

August 6, 2025 – An AWC was issued in which the firm was censured, fined \$75,000, and required to comply with the undertaking enumerated in this AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and maintain a supervisory system, including WSPs, reasonably designed to achieve compliance with applicable securities laws and regulations prohibiting prearranged trading, a form of manipulative trading. The findings stated that the firm relied on its registered representatives to identify and escalate to supervisors potential prearranged trading, and on its supervisors to identify such transactions as part of their daily review of transactions using trade reports and summaries. However, those reports are not designed to surveil for potential prearranged trading. The firm utilized a daily trade summary for fixed income transactions containing hundreds of rows in the body of an email, which cannot be filtered or sorted to identify patterns such as offsetting transactions executed in close proximity in the same security for the same quantity and does not reflect trading patterns over time. As a result of the firm's unreasonable supervisory system, it failed to surveil for at least 138 instances of potentially manipulative prearranged trading. The findings also stated that the firm failed to disclose required mark-up or mark-down information on 717 retail customer confirmations. The findings also included that the firm's supervisory system was not reasonably designed to achieve compliance with the Municipal Securities Rulemaking Board's (MSRB) Rule G-15 and FINRA Rule 2232. The firm's WSPs did not provide a process for supervisory review of customer confirmations to ensure that the required markup and markdown disclosures were made. Ultimately, the firm updated its WSPs to require a documented supervisory review of trade confirmations for disclosures. ([FINRA Case #2021069359401](#))

Goldman Sachs & Co. LLC ([CRD #361](#), New York, New York)

August 7, 2025 – An AWC was issued in which the firm was censured and fined \$250,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it participated in an initial public offering (IPO) in which it had a conflict of interest, but a qualified independent underwriter (QIU) did not participate in the preparation of the registration statement and prospectus. The findings stated that firm served as the lead underwriter for an IPO for a company, which raised approximately \$700 million. The company used the offering proceeds to purchase Limited Liability Company (LLC) units for a different company, of which a firm affiliate served as a lender to and received \$96 million from the offering proceeds. The findings also stated that the firm permitted four individuals to perform investment banking activities requiring registration during periods when they were not registered with FINRA in any capacity. The unregistered persons worked as part of investment banking deal teams, engaging in activities such as advising clients on securities offerings. The unregistered persons were not timely registered notwithstanding that each of them was previously registered with FINRA as an Investment Banking Representative within two years of the date the firm hired them, and therefore did not need to take

and pass a qualification examination before becoming registered through the firm. The findings also included that the firm failed to establish, maintain, and enforce a supervisory system, including written procedures, reasonably designed to achieve compliance with FINRA registration requirements. The firm required new hires who were previously registered with FINRA to transfer their registrations within 30 days of their hire date and sent them notices that they were not allowed to perform work requiring registration until they obtained or transferred all required registrations. However, the firm had no procedures reasonably designed to escalate issues with employees who failed to timely obtain or transfer their registrations. Although the firm maintained weekly reports that tracked pending and overdue registration requirements, the firm did not regularly review those reports to promptly identify employees with outstanding registration issues. The firm's weekly reports identified individuals as having overdue registrations, yet the firm permitted them to be added to deal teams and perform investment banking activities requiring registration. Ultimately, the firm took steps to revise its supervisory system, including by modifying its procedures to require monthly reviews of registration reports and escalate issues for employees with outstanding registrations. ([FINRA Case #2022073415001](#))

Wells Fargo Clearing Services, LLC ([CRD #19616](#), St. Louis, Missouri)

August 11, 2025 – An AWC was issued in which the firm was censured and fined \$275,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and maintain a supervisory system, including WSPs, that was reasonably designed to achieve compliance with Section 15b(a)(1)(B) of the Securities Exchange Act of 1934. The findings stated that the firm had hundreds of municipal entity customers who transacted in municipal and non-municipal securities in their firm accounts, but the firm was not registered as a municipal advisor. The firm did not establish and maintain a supervisory system, including WSPs, that was reasonably designed to ensure that the firm's and its associated persons' investment-related activities did not require the firm to register as a municipal advisor. Although the firm's WSPs prohibited its associated persons from advising municipal entities about investing proceeds from the issuance of municipal securities, the firm did not provide guidance to its associated persons about what constituted providing such advice and what other activities require municipal advisor registration. In addition, the firm did not have any process for identifying whether deposits in municipal entities' accounts were proceeds from the issuance of municipal securities and did not implement controls to detect and prevent associated persons from giving advice to municipal entities about investing proceeds from the issuance of municipal securities. While the firm relied on provisions in its client account agreement and disclosures provided to customers in their year-end account statements to help ensure municipal entities were not depositing proceeds from the issuance of municipal securities, these provisions and disclosures were not prominent. The firm did not otherwise take reasonable steps to ensure that its services for municipal entities did not include providing advice on the investment of proceeds from the issuance of municipal securities and thus constitute municipal advisory activity. Ultimately, the firm took steps to modify its supervisory system, including its WSPs, relating to municipal advisory activity. ([FINRA Case #2023078410201](#))

Stephens Inc. ([CRD #3496](#), Little Rock, Arkansas)

August 12, 2025 – An AWC was issued in which the firm was censured and fined \$90,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish, maintain, and enforce a supervisory system, including WSPs, reasonably designed to achieve compliance with the provisions of MSRB Rule G-37(b) governing political

contributions by firms and Municipal Finance Professionals (MFPs). The findings stated that the firm's WSPs concerning political contributions by the firm's MFPs included procedures designed to determine whether the intended recipient of a political contribution was an issuer official. However, the firm employed a different process which was not memorialized in the firm's WSPs or elsewhere for the majority of MFP political contributions to candidates for state-level offices, which were made by one of the firm's MFPs. For these political contributions, the firm outsourced its responsibility to determine whether the candidates were issuer officials to a third party. The firm directed the third party to obtain a signed certification from each candidate attesting that the candidate was not an issuer official within the meaning of MSRB Rule G-37 before the MFP's contribution was made. However, the firm had no system or procedures to review whether the third party obtained a signed certification from the candidate as required before delivering a political contribution, and the firm did not conduct such reviews. The firm therefore failed to timely detect that, in some instances, the third party delivered contributions from the MFP without first receiving signed certifications, including one instance in which a political contribution was made to an issuer official and exceeded MSRB Rule G-37's de minimis exception. The firm's unreasonable supervision created the risk that the firm would engage in municipal securities business in violation of MSRB Rule G-37. Ultimately, the firm terminated its relationship with the third party involved in determining whether candidates were issuer officials and began requiring the legal department to review and pre-approve all MFP political contributions. Subsequently, the firm updated its WSPs to reflect these new procedures. ([FINRA Case #2022075470401](#))

Stifel, Nicolaus & Company, Incorporated ([CRD #793](#), St. Louis, Missouri)

August 14, 2025 – An AWC was issued in which the firm was censured and fined \$175,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it violated Rule 606(a) of Regulation NMS by publishing 16 inaccurate or incomplete information in its Rule 606 reports. The findings stated that the reports inaccurately disclosed the net aggregate amount of payment for order flow received by the firm, payment received by the firm related to profit-sharing relationships, transaction fees paid by the firm, and transaction rebates received by the firm. Additionally, in 11 quarterly Rule 606 reports, the firm misidentified three broker-dealers as execution venues which did not qualify as execution venues for purposes of Rule 606 reporting. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to achieve compliance with Rule 606(a). The firm retained a third-party vendor to prepare its Rule 606 reports, using data provided by the firm to generate statistical information concerning the routing of customer orders. However, the firm's WSPs did not require, and the firm did not conduct, any review to ensure that the data provided to the vendor was complete and accurate. The firm also had no supervisory system or WSPs requiring review of the material aspects disclosures in its Rule 606 reports before they were published. The firm's WSPs did not require the firm to review its Rule 606 reports after they were published to achieve compliance with the disclosure requirements of Rule 606(a). Ultimately, the firm updated its supervisory system related to Rule 606 reporting, including by establishing supervisory reviews of the information provided to the vendor and published in the firm's Rule 606 reports and updated its WSPs to reflect these new procedures. ([FINRA Case #2022073415101](#))

Interactive Brokers LLC ([CRD #36418](#), Greenwich Connecticut)

August 21, 2025 – An AWC was issued in which the firm was censured and fined \$650,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings

that it failed to exercise reasonable due diligence when approving certain Self-Directed Customers to trade options. The findings stated that the firm's system to review and approve Self-Directed Customers to trade options was not reasonably designed. The firm used a primarily automated process to approve or disapprove Self-Directed Customer accounts for options trading. To be considered for options trading, the firm required Self-Directed Customers to complete a customer account profile and indicate their interest in options trading. The firm manually reviewed certain applications based on the information provided by the Self-Directed Customer, but most applications were reviewed pursuant to the firm's automated process. If the Self-Directed Customer did not satisfy the firm's eligibility criteria, the firm did not allow the Self-Directed Customer to complete their request to trade options and instead provided the Self-Directed Customer with an error message stating that they were not eligible to trade options. At first, the automatic error message advised those customers of the firm's relevant eligibility criteria needed to qualify for options trading. The firm later changed the message and no longer informed customers of the firm's eligibility criteria, but at times told customers which category of eligibility criteria they did not satisfy. The firm allowed Self-Directed Customers to change their account profile information and did not restrict how often customers could do so. Although the firm retained each iteration of the customer account profile and required its customers to affirm the accuracy of their account profile, it did not compare the eligibility information contained in a Self-Directed Customer's most recent account profile to information the customer submitted previously. As a result, the firm did not detect certain instances in which certain Self-Directed Customers submitted inconsistent information regarding their years of options trading experience. The firm approved certain Self-Directed Customers to trade options despite red flags that options trading may not have been appropriate for those customers. The findings also stated that the firm failed to keep a record of its disapproval of certain Self-Directed Customers to trade options. The firm did not make or preserve records of which Self-Directed Customers received pop-up screens or error messages or when they were received, nor did the firm make or preserve any other record reflecting when it disapproved these customers' accounts for options trading. Subsequently, the firm began implementing a process to retain records of all disapprovals of Self-Directed Customer account requests to trade options. ([FINRA Case #2021071984801](#))

Navian Capital Securities LLC ([CRD #145037](#), Cincinnati, Ohio)

August 21, 2025 – An AWC was issued in which the firm was censured, fined \$40,000 and required to comply with the undertaking enumerated in this AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to accurately report, failed to report, or failed to timely report transactions to the Trade Reporting and Compliance Engine (TRACE) in TRACE-eligible corporate debt securities. The findings stated that the firm failed to timely report approximately 1,200 TRACE-eligible corporate debt securities transactions to TRACE. Most of these late reports were the result of human error. In addition, the firm misapplied the List or Fixed Offering Price Transaction or Takedown Transaction indicator in TRACE Reports in 179 transactions. The firm also reported 586 Corporate Debt Security transactions to TRACE with inaccurate execution times; one Corporate Debt Security transaction with an inaccurate price; one transaction with an inaccurate in execution date; and reported one transaction with an inaccurate contra-party identifier. Many of these instances occurred because the firm incorrectly amended the market indicator, which caused further reporting errors. Other causes include human error. Furthermore, the firm reported 30 duplicate transactions and failed to report 57 transactions in Corporate Debt Securities. These were primarily caused by miscommunications with third parties,

human error, and re-reporting trades to amend the market indicator without cancelling the original trade report. The findings also stated that the firm failed to establish, maintain, and enforce WSPs reasonably designed to achieve compliance with FINRA Rule 6730. The firm's WSPs failed to address when and how the firm was supervising that it was reporting transactions to TRACE timely and accurately. Instead, the firm's WSPs only prescribed review of unmatched trade reports to ensure all inter-dealer trades had been reported to TRACE. The firm also failed to supervise for the timeliness of trade reporting, the accuracy of certain market indicators, and the accuracy of trade reports overall. Additionally, the firm failed to reasonably investigate and act upon red flags relating to its TRACE reporting. Although the firm received communications from FINRA flagging their TRACE reporting issues, the firm did not fully remediate the issues in a reasonable time frame. Ultimately, the firm made improvements both to its supervisory system and its TRACE reporting processes. ([FINRA Case #2023078229701](#))

T3 Trading Group, LLC ([CRD #154431](#), New York, New York)

August 21, 2025 – An AWC was issued in which the firm was censured, fined \$175,000, and required to comply with the undertaking enumerated in this AWC. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to comply with its obligation to publish quarterly reports concerning the firm's handling of customer orders in National Market System (NMS) securities. The findings stated that the firm failed to publish any such reports from April 2020 to July 2021. Thereafter, from July 2021 to April 2025, the firm published quarterly reports that contained none, or very little, of the information that the firm was required to disclose, such as order routing percentages, execution venues, payment-for-order-flow calculations, or the material aspects of the firm's relationships with execution venues. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to achieve compliance with Rule 606(a) of Regulation NMS under the Securities Exchange Act of 1934. ([FINRA Case #2021069274901](#))

U.S. Bancorp Investments, Inc. ([CRD #17868](#), Saint Paul, Minnesota)

August 22, 2025 – An AWC was issued in which the firm was censured and fined \$500,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it did not timely file 42 Suspicious Activity Reports (SARs). The findings stated that when determining whether to file SARs, the firm incorrectly used a \$25,000 monetary threshold applicable to banks rather than the \$5,000 threshold applicable to broker-dealers. The suspicious activity that went unreported included account intrusions, identity theft, and internet scams. Ultimately, after reviewing a similar FINRA enforcement action against a different company, the firm identified that it had been applying the \$25,000 threshold to brokerage account activity. The firm promptly took a number of remedial steps and other actions, including performing a six-year lookback review, retroactively filing the 42 SARs identified in that review, amending its written procedures to clarify the broker-dealer monetary thresholds, additional training of personnel responsible for reporting suspicious transactions about the \$5,000 broker-dealer threshold, and promptly self-reporting to FINRA. By applying the incorrect SAR filing threshold, the firm failed to establish and implement policies and procedures reasonably designed to detect and cause the reporting of suspicious activity. ([FINRA Case #2023079913301](#))

J.P. Morgan Securities LLC ([CRD #79](#), New York, New York)

August 26, 2025 – An AWC was issued in which the firm was censured and fined \$150,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that its supervisory system, including its WSPs, was not reasonably designed to achieve compliance with applicable preliminary initial public offering (IPO) prospectus delivery requirements for IPO allocations to the firm's institutional customers. The findings stated that while the firm's WSPs required the firm to deliver a copy of a preliminary IPO prospectus to a customer expected to receive an allocation, the supervisory system and WSPs governing the process were not reasonably designed to verify that such delivery had taken place. The supervisory system also did not provide for a review or process to determine whether preliminary IPO prospectuses had been delivered successfully to the firm's institutional customers. As a result, available information showing that prospectuses had not been delivered was not reviewed by the firm. Additionally, the firm reviewed whether the institutional customer had provided electronic consent and had an email address on file for a sample of three IPOs per quarter. Therefore, for most of the IPOs distributed by the firm during the review period, no supervisory review concerning preliminary IPO prospectus delivery occurred. The firm also failed to add customers who declined to provide electronic consent to a list of customers who would be provided hard copies of preliminary IPO prospectuses by mail as required by the firm's WSPs. As a result, the firm's supervisory system did not timely identify whether the firm had provided preliminary prospectuses to customers of the firm's IPOs at least 48 hours before sending confirmations of sale to the institutional customers and the firm did not detect instances where the firm did not timely deliver preliminary IPO prospectuses to institutional customers. The firm self-identified certain of these preliminary IPO prospectus delivery deficiencies and subsequently took remedial actions to correct the deficiencies and revise its WSPs. ([FINRA Case #2021072799801](#))

Firm Sanctioned

PFS Investments Inc. ([CRD #10111](#), Duluth, Georgia)

August 14, 2025 – An AWC was issued in which the firm was censured and is ordered to pay \$710,738.55, plus interest, in restitution to affected customers. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish and maintain a system reasonably designed to supervise the application of sales charge waivers and fee rebates to which customers were entitled through rights of reinstatement offered by mutual fund companies. The findings stated that the firm, whose customers transact directly with mutual fund issuers, relied on individual registered representatives and their customers to manually identify and ensure customers received rights of reinstatement discounts from mutual fund issuers. The firm did not have any automated surveillance that was specifically designed to flag instances in which customers missed discounts for which they were eligible. The firm did not ensure customers received rights of reinstatement benefits from mutual fund issuers to which they were entitled and those customers paid \$710,738.55 in excess sales charges and fees. ([FINRA Case #2020068652701](#))

Individuals Barred

Nathaniel Edwin Mogollan ([CRD #7704553](#), Brooklyn, New York)

August 7, 2025 – An AWC was issued in which Mogollan was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Mogollan 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 that originated from a tip submitted to it. ([FINRA Case #2025084767301](#))

Ruben Rojas-Salvador ([CRD #7801564](#), Brooklyn, New York)

August 7, 2025 – An AWC was issued in which Rojas-Salvador was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Rojas-Salvador 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 a matter that originated from a tip submitted it. ([FINRA Case #2025084767302](#))

Lyle Hisaji Uyeda ([CRD #2637150](#), Honolulu, Hawaii)

August 28, 2025 – An AWC was issued in which Uyeda was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Uyeda consented to the sanction and to the entry of findings that he refused to appear for on-the-record testimony requested by FINRA connection with an investigation into the circumstances surrounding a Uniform Termination Notice for Securities Industry Registration (Form U5) filed by his member firm stating that it had discharged him for engaging in a series of personal loans totaling approximately \$1.45 million from a client. ([FINRA Case #2025085994001](#))

Individuals Suspended

Ramin Nathaniel Abrams ([CRD #6705502](#), Manhasset, New York)

August 4, 2025 – An AWC was issued in which Abrams was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for three months. Without admitting or denying the findings, Abrams consented to the sanctions and to the entry of findings that he made negligent misrepresentations of material fact when he drafted and provided letters to the employer of two customers on behalf of his member firm without prior approval. The findings stated that the customers, both of whom worked for a different FINRA member firm, separately requested Abrams provide them with letters for their employer containing information about their accounts with Abrams' firm, including whether those accounts were managed or self-directed accounts. Both letters stated that the customers' accounts at Abram's firm were managed on a discretionary basis, but then incorrectly stated that the customers did not have the ability to self-direct trades in the accounts when they did.

The suspension is in effect from August 4, 2025, through November 3, 2025. ([FINRA Case #2023077951801](#))

Brenton E. Ditto ([CRD #4779103](#), Elizabethtown, Kentucky)

August 8, 2025 – An AWC was issued in which Ditto was fined \$5,000, suspended from association with any FINRA member in all capacities for four months, and ordered to pay disgorgement of commissions received in the amount of \$402.58, plus interest. Without admitting or denying the findings, Ditto consented to the sanctions and to the entry of findings that he willfully violated Rule 15l-1(a)(1) under the Securities Exchange Act of 1934 (Reg BI) by recommending that a 95-year-old customer invest in Government National Mortgage Association (GNMA) support class bonds. The findings stated that GNMA support class bonds are a complex product for which Ditto did not have a reasonable basis to believe was in the customer's best interest based on his investment profile. Ditto recommended that his customer purchase the bonds for approximately \$71,000, for which Ditto received over \$400 in commission. Ditto failed to review the prospectus and did not take into account the risk factors associated with recommending the support class bonds, including that principal repayments for the bonds could be directed to those classes with a higher priority, and in a rising interest rate environment the bonds were likely to lose value. Indeed, interest rates rose after Ditto purchased the support class bonds and his customer received no principal repayment on the bonds and their value decreased. Ditto's customer incurred approximately \$19,000 in losses from his investments and settled a claim with Ditto's member firm.

The suspension is in effect from September 2, 2025, through January 1, 2026. ([FINRA Case #2023079054101](#))

Simon Michel Joseph ([CRD #5602157](#), Alexandria, Virginia)

August 8, 2025 – An AWC was issued in which Joseph was assessed a deferred fine of \$5,000, censured, and suspended from association with any FINRA member in all capacities for six months. Without admitting or denying the findings, Joseph consented to the sanctions and to the entry of findings that he willfully failed to disclose a Consent Order issued by the Maryland Securities Commissioner of the Maryland Securities Division on several Uniform Application for Securities Industry Registration or Transfer (Form U4) filings submitted to FINRA. The findings stated that the Consent Order against Joseph found that he had engaged in dishonest and unethical practices by, among other things, effecting discretionary transactions in customer accounts without written authorization and by mismarking order tickets. Joseph had notice of the Consent Order when it was issued. However, Joseph did not timely amend his Form U4 to disclose the Consent Order when he was registered at his member firm, nor did he disclose the Consent Order on Form U4 filings submitted through subsequent firms with which he was registered.

The suspension is in effect from August 18, 2025, through February 17, 2026. ([FINRA Case #2024083025801](#))

Mack Leon Miller ([CRD #2822317](#), Kearny, New Jersey)

August 11, 2025 – An AWC was issued in which Miller was suspended from association with any FINRA member in all capacities for nine months. In light of Miller's financial status, no monetary sanctions have been imposed. Without admitting or denying the findings, Miller consented to the sanction and to the entry of findings that he willfully violated Reg BI when he recommended a series of trades that were excessive, unsuitable, and not in the two senior customers' best interests. The findings stated that Miller's trading generated \$32,230 in commissions and resulted in \$71,022 in

realized losses. One of the customers relied on Miller's advice and routinely followed his recommendations, and, as a result, Miller exercised de facto control over that customer's account.

The suspension is in effect from September 2, 2025, through June 1, 2026. ([FINRA Case #2018056490331](#))

Brandon Jerome Larsen ([CRD #6192239](#), Green Bay, Wisconsin)

August 13, 2025 – An AWC was issued in which Larsen was fined \$5,000 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Larsen consented to the sanctions and to the entry of findings that he exercised discretion without written authority in 14 brokerage accounts by effecting 165 trades. The findings stated that although the customers knowingly permitted Larsen to exercise discretion in their accounts, he did not have their written authorization or his member firm's acceptance of the accounts as discretionary.

The suspension was in effect from September 2, 2025, through October 1, 2025. ([FINRA Case #2024081055001](#))

Derrick Hostert ([CRD #6583919](#), Omaha, Nebraska)

August 14, 2025 – An AWC was issued in which Hostert was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for four months. Without admitting or denying the findings, Hostert consented to the sanctions and to the entry of findings that he falsified an insurance claim form on behalf of a customer. The findings stated that after Hostert sold a home insurance policy to two customers, the customers suffered a fire loss to a garage on their property. After Hostert realized that he had mistakenly failed to include the garage in the home insurance policy, he emailed his underwriter to get coverage for the garage added to the policy. Hostert then submitted an insurance claim form on behalf of the customers for the fire at the garage in which he intentionally listed the date of loss as three days after the actual loss. The insurance company discovered the falsification and then later settled with the customers.

The suspension is in effect from August 18, 2025, through December 17, 2025. ([FINRA Case #2024081936601](#))

William Charles Burks, II ([CRD #2944992](#), Copper Canyon, Texas)

August 21, 2025 – An AWC was issued in which Burks was fined \$10,000 and suspended from association with any FINRA member in all capacities for four months. Without admitting or denying the findings, Burks consented to the sanctions and to the entry of findings that he recommended that three customers invest an unsuitably high concentration of their accounts in alternative investments which were illiquid or had limited liquidity and subjected the customers to a substantial risk of loss. The findings stated that the investments included non-traded real estate investment trusts (REITs), business development companies (BDCs), and interval funds. Each of the three customers had a low or moderate risk tolerance and two had investment objectives of preserving capital and generating income, which was not reflected on the transaction paperwork submitted to the firm. Each of the customers have filed an arbitration concerning the recommendations at issue, and two of the customers have reached settlements of those claims.

The suspension is in effect from September 15, 2025, through January 14, 2026. ([FINRA Case #2021072047201](#))

Dennis Daniel Herrera ([CRD #4618370](#), North Bay Village, Florida)

August 21, 2025 – An AWC was issued in which Herrera 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 \$158,500, plus interest, in deferred restitution to customers. Without admitting or denying the findings, Herrera consented to the sanctions and to the entry of findings that he willfully violated Reg BI by recommending to two customers, one of whom was a senior, a series of trades that were excessive, unsuitable and not in the customers’ best interest. The findings stated that one of the customers relied on Herrera's advice and routinely followed his recommendations, and, as a result, Herrera exercised de facto control over the account. Herrera’s trading generated \$158,500 in commissions and caused \$358,979 in realized losses in the customers’ accounts.

The suspension is in effect from September 2, 2025, through March 1, 2026. ([FINRA Case #2022073724201](#))

Joseph Kelly ([CRD #4560737](#), Conroe, Texas)

August 22, 2025 – An AWC was issued in which Kelly was fined \$10,000, suspended from association with any FINRA member in all capacities for nine months, and ordered to pay \$69,830, plus interest, in restitution to customers. Without admitting or denying the findings, Kelly consented to the sanctions and to the entry of findings that he willfully violated Reg BI in the case of one customer and violated FINRA Rules 2111 and 2010 in the case of three customers by recommending a series of trades that were excessive, unsuitable and not in the customers’ best interest. The findings stated that some of the customers relied on Kelly's advice and routinely followed his recommendations, and as a result, Kelly exercised de facto control over their accounts. Kelly's recommendations to the customers generated \$365,344 in total commissions and caused \$262,683 in total realized losses. The amount of restitution is equal to the total commissions charged to two of the customers as the remaining affected customers previously settled claims with Kelly's member firm.

The suspension is in effect from September 15, 2025, through June 14, 2026. ([FINRA Case #2018056490332](#))

Antonio Molinos ([CRD #2764977](#), Commack, New York)

August 22, 2025 – An AWC was issued in which Molinos was suspended from association with any FINRA member in all capacities for three months. In light of Molinos’ financial status, no monetary sanctions have been imposed. Without admitting or denying the findings, Molinos consented to the sanctions and to the entry of findings that he willfully violated Reg BI by recommending a series of trades that were excessive, unsuitable, and not in a customer’s best interest. The findings stated that the customer, who was retired, relied on Molinos’ advice and routinely followed his recommendations, and as a result, Molinos exercised de facto control over the accounts. Molinos’ trading in the customer’s accounts account generated \$91,617 in commissions and caused \$87,920 in realized losses.

The suspension is in effect from September 15, 2025, through December 14, 2025. ([FINRA Case #2018056490333](#))

Philip Leo Gazzo ([CRD #1237203](#), Orange Beach, Alabama)

August 25, 2025 – An AWC was issued in which Gazzo 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, Gazzo consented to the sanctions and to the entry of findings that he shared approximately \$14,000 in commissions generated from securities transactions with an unregistered entity. The findings stated that Gazzo was aware that neither the entity nor the individual owner was registered with FINRA. A day prior to sharing the commissions, Gazzo attested to his member firm in a quarterly compliance questionnaire that he would not share commissions from any securities transaction with any person or entity without the firm's prior approval.

The suspension is in effect from September 2, 2025, through November 1, 2025. ([FINRA Case #2024082052701](#))

Zachary Ellis Taylor ([CRD #6074776](#), Laguna Beach, California)

August 25, 2025 – An AWC was issued in which Taylor was suspended from association with any FINRA member in all capacities for nine months. In light of Taylor's financial status, no monetary sanctions have been imposed. Without admitting or denying the findings, Taylor consented to the sanction and to the entry of findings that he willfully violated Reg BI by recommending that at least three senior customers with balanced allocation investment objectives and moderate risk tolerances invest in speculative options strategies. The findings stated that Taylor recommended that the customers sell puts, typically large numbers of puts in one underlying security at a time. As time passed, Taylor recommended that the customers sell more of these puts, putting at risk most of the principal value of their accounts. Taylor also began recommending increasingly risky puts, where the strike price was closer to the trading price. Taylor's recommendations were not in the customers' best interest and were unsuitable for them based on their investment profiles. When the accounts of one customer were transferred out of Taylor's member firm, the customer had approximately \$130,000 in realized and unrealized losses resulting from his sales of puts in a stock. Taylor's firm has settled arbitrations with two of the customers for a total of \$420,000 without contribution from Taylor.

The suspension is in effect from September 2, 2025, through June 1, 2026. ([FINRA Case #2022075083801](#))

Joseph Warner Rozof ([CRD #5274784](#), New York, New York)

August 29, 2025 – An AWC was issued in which Rozof was assessed a deferred fine of \$10,000 and suspended from association with any FINRA member in all capacities for 45 days. Without admitting or denying the findings, Rozof consented to the sanctions and to the entry of findings that he placed over 250 discretionary trades in the brokerage accounts of two customers of his member firm without written authorization. The findings stated that Rozof discussed his trading strategy with the customers generally but he did not speak with the customers about the specific trades on the dates of the transactions and his firm did not accept the accounts as discretionary. The findings also stated that Rozof prevented his firm from preserving messages by using a personal cell phone to exchange business-related messages with customers, including the two customers in whose accounts he placed discretionary trades. Rozof did not provide the text messages to his firm for review or retention and as a result caused his firm to maintain incomplete books and records.

The suspension is in effect from September 2, 2025, through October 16, 2025. ([FINRA Case #2022073349701](#))

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 these allegations in the complaint.

Ali F. Chehab ([CRD #7625979](#), Portland, Oregon)

August 5, 2025 – Chehab was named a respondent in a FINRA complaint alleging that he failed to provide information and documents requested by FINRA as part of its investigation into allegations that he had engaged in sales practice violations including selling away, unauthorized trading, and making material misrepresentations to customers. The complaint alleges that Chehab's failure to provide the requested information and documents impeded FINRA's investigation into his potential misconduct because he deprived FINRA of documents and information that were material to its investigation. ([FINRA Case #2024082633901](#))

James Thaddeus Walesa ([CRD #1061209](#), Park Ridge, Illinois)

August 8, 2025 – Walesa was named a respondent in a FINRA complaint alleging that he failed to produce documents and information requested by FINRA as part of its investigation into the circumstances surrounding allegations made in a Statement of Claim against Walesa and his member firm, including whether Walesa committed sales practice violations and participated in undisclosed private securities transactions while he was registered with the firm. The complaint alleges that the Statement of Claim stated, among other things, that three weeks before a senior customer passed away, Walesa recommended that the customer, through a family trust, invest \$200,000 in a highly speculative, private placement in a company that sold senior care products and offered residential care and adult daily care services. The Statement of Claim further alleged that after the customer's passing, the customer's daughter became the successor trustee of the trust, and Walesa later recommended that the daughter invest another \$100,000 from the trust into the same private placement. The Statement of Claim further alleged that the total investment had become worthless. Walesa had disclosed his involvement with the company as an outside business activity (OBA) in the Central Registration Depository (CRD). In his CRD disclosure, Walesa represented that his role as the chairman of the company, which he described as a healthcare and wellness company, was not investment related. The complaint also alleges that Walesa failed to appear for and provide on-the-record testimony requested by FINRA in connection with its investigation. As a result, FINRA was unable to obtain Walesa's testimony regarding, among other things, his activities with the company, his recommendations to the customer, the daughter, and other customers, and his activities with respect to other investments. ([FINRA Case #2023080442901](#))

Jeffrey Kenneth Galvani ([CRD #3048728](#), Hoboken, New Jersey) and Stuart A. Jeffrey ([CRD #5241790](#), Rockville Centre, New York)

August 19, 2025 – Galvani and Jeffrey were named as respondents in a FINRA complaint alleging that they failed to appear for and provide on-the-record testimony requested by FINRA in connection with its investigation of among other things, their OBAs and private securities transactions. The complaint alleges that FINRA’s investigation concerns Galvani and Jeffrey’s roles with outside entities that provided services to customers who traded low-priced securities, often known as penny stocks, and their disclosures of the activities to their member firm. Galvani and Jeffrey’s failure to appear for testimony significantly impeded FINRA’s investigation. ([FINRA Case #2020068865301](#))

Mark Elliot Paverman ([CRD #1046105](#), Boca Raton, Florida) and Jeffrey Alan Stanley ([CRD #4645288](#), Parker, Colorado)

August 28, 2025 – Paverman and Stanley were named respondents in a FINRA complaint alleging that Stanley failed to reasonably supervise the cash management program of his member firm. The complaint alleges that the firm, through Stanley, failed to establish and maintain a supervisory system reasonably designed to ensure compliance with FINRA rules. Stanley approved the opening of hundreds of thousands of firm brokerage accounts without obtaining adequate authorization from customers. Stanley also approved the transfer of customer funds without adequate authorization from customers and failed to establish and implement a system to supervise the transfer of brokerage customer funds. The firm, under Stanley, failed to detect the reallocation of tens of millions of dollars through ledgering movements from the firm’s cash management accounts to a bank that occurred without customer authorization. In addition, Stanley failed to supervise unregistered personnel of the firm’s corporate parent conducting key brokerage functions and failed to investigate red flags of ledgering discrepancies. The complaint also alleges that the firm, acting through Paverman, failed to preserve electronic communications of three of its registered representatives; failed to preserve instant messages of any of its registered representatives; and failed to preserve electronic communications of personnel from its corporate parent who performed brokerage functions. The complaint further alleges that Paverman made misrepresentations to FINRA by providing a false certification that the firm directly contracted with a vendor for record retention and the firm had independent access to the records maintained by the vendor. The firm did not have independent access to the records maintained by the vendor because the contract was with its parent, and it was reliant on its parent to obtain access to those records which Paverman was unable to provide FINRA. ([FINRA Case #2023080111701](#))

Firm 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.)

Third500, LLC (CRD #115542)
 Wilmette, Illinois
 (May 27, 2025 – August 4, 2025)

Individual 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.)

Ariel A. Rivero (CRD #4236679)
 Miami, Florida
 (May 2, 2025 – August 12, 2025)
 FINRA Case #2021072830601

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.)

William Shane Garrow (CRD #4656104)
 Tulsa, Oklahoma
 (August 19, 2025)
 FINRA Case #2024081829901

Noah Dewayne Shaw (CRD #6641769)
 Jacksonville, Florida
 (August 11, 2025)
 FINRA Case #2025084719001

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.)

Amber Nicole Cook (CRD #7360336)
 Jefferson City, Missouri
 (June 16, 2025 – August 27, 2025)
 FINRA Case #2024084068801

Bernie Mohar (CRD #7677993)
 Glen Ellyn, Illinois
 (August 25, 2025)
 FINRA Case #2025084985401

Kathleen Rashleigh (CRD #1483453)
 Omaha, Nebraska
 (August 25, 2025)
 FINRA Case #2025084994601

George Stratis (CRD #2985613)
 Toronto, Ontario, Canada
 (August 18, 2025)
 FINRA Case #2024084277901

Anna Marie Verzosa (CRD #6787085)
 Greenwich, Connecticut
 (August 18, 2025)
 FINRA Case #2024084451701

Andrew S. Walters (CRD #7291210)
 Lexington, Kentucky
 (May 22, 2025 – August 7, 2025)
 FINRA Case #2024084337301

Nathan Reed Waters (CRD #7802876)
 Sherman Oaks, California
 (August 29, 2025)
 FINRA Case #2024084504201

Kevin Tong You (CRD #7706430)
 Corona, California
 (August 8, 2025)
 FINRA Case #2024083676601

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.)

Robert George Gorham (CRD #1426444)
 Mahwah, New Jersey
 (August 6, 2025)
 FINRA Arbitration Case #25-00270

Cynthia Lynn Wadkinson (CRD #1578237)
 Greensboro, North Carolina
 (April 26, 2016 – August 27, 2025)
 FINRA Arbitration Case #15-01806