

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS**

DEPARTMENT OF ENFORCEMENT,

Complainant,

v.

SUTTER SECURITIES INCORPORATED
(CRD No. 30770),

and

KEITH CHARLES MOORE
(CRD No. 5191450),

Respondents.

Disciplinary Proceeding
No. 2021071987902

Hearing Officer–MJD

**ORDER REQUIRING CERTIFICATION OF
COMPLIANCE WITH FINRA RULE 9910**

In this disciplinary proceeding, the Department of Enforcement alleges that during 2020 and 2021 Respondents Sutter Securities Incorporated and Keith Charles Moore maintained an unreasonable supervisory system and failed to supervise to ensure compliance with the suitability requirements of FINRA Rule 2111 and Regulation Best Interest. The Complaint also alleges that Sutter Securities, acting through a registered representative, willfully violated Regulation Best Interest by excessively trading the accounts of an elderly customer. Respondents have not yet filed an Answer, and no hearing date has been set.

Christopher J. Kelly and Lisa M. Colone recently entered their appearances in this proceeding as counsel for Respondents. Both are former employees and senior officers with FINRA's Department of Enforcement. Mr. Kelly joined FINRA in 2014 and left in November 2023. Ms. Colone joined FINRA in 2016 and left in November 2023.

FINRA Rule 9910 has post-FINRA-employment conflict-of-interest provisions that apply to former FINRA employees. Under Rule 9910(a), former FINRA officers may not appear before FINRA on behalf of another person in connection with any matter for one year.

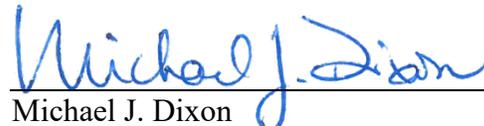
FINRA Rule 9910(b) provides that former FINRA employees may not appear before FINRA on behalf of another person in connection with a matter involving a specific party or

parties “in which the former employee participated personally and substantially as an employee,” and in which FINRA is a party.

Under Rule 9910(c), former FINRA employees may not appear for two years post-employment before FINRA on behalf of another person in connection with a matter in which FINRA is a party and involving a specific party or parties “which the former employee knows or reasonably should know was actually pending under the former employee’s official responsibility, within the one-year period prior to termination of his or her employment with FINRA.”

Information about FINRA’s “Revolving Door Rules” may be found on FINRA’s website at <http://www.finra.org/about/revolving-door-rules>.

For Mr. Kelly and Ms. Colone to continue as counsel for Respondents in this matter, they must file with this office and serve on Enforcement a notarized affidavit indicating that their appearance in this matter complies with FINRA Rule 9910.


Michael J. Dixon
Hearing Officer

Dated: February 12, 2026

Copies to:

Allison Miller, Esq., Chiesa Shahinian & Giantomasi PC, for Respondents (via OHO Docket Portal)

Lisa M. Colone, Esq., Chiesa Shahinian & Giantomasi PC, for Respondents (via OHO Docket Portal)

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