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FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS

DEPARTMENT OF ENFORCEMENT, Complainant, v. SPARTAN CAPITAL SECURITIES, LLC (CRD No. 146251), KIM M. MONCHIK (CRD No. 2528972), FREDERICK JOSEPH CAMMARANO III, (CRD No. 2277307), JAMES PECORARO (CRD No. 2440231), JOHN J. STAPLETON (CRD No. 2791194), and MICHAEL DARVISH (CRD No. 3243141), Respondents.	Disciplinary Proceeding No. 2018056490335 Hearing Officer–MPD

PROTECTIVE ORDER GOVERNING PERSONAL CONFIDENTIAL INFORMATION

FINRA disciplinary proceedings routinely require the production of personal confidential information ("PCI"), as defined below. Accordingly, to guard against identity theft and other improper use, and pursuant to FINRA Rule 9235 and subject to the limits set forth in FINRA Rule 9146(k)(2), the following provisions shall govern the production, handling, and use of PCI.

1. **Defined Terms.**

a. **"Document"** means any writing, drawing, graph, chart, photograph, recording, or data compilation (including electronically stored information).

b. "**Proceeding"** means the above-captioned disciplinary proceeding and any appellate proceedings related to this disciplinary proceeding.

c. "**PCI"** means:

- Social Security number ("SSN") or Individual Taxpayer Identification ("ID") Number; or
- Any combination of data elements including an individual's name, phone number, or residential address plus data from one or more of the following categories:
  - Personal Identification Numbers—such as SSNs, state driver's license numbers, state ID numbers, Employee ID numbers, Passport numbers, Insurance identification or policy numbers, Tribal ID numbers.
  - Financial Account Numbers—such as brokerage account numbers, bank account numbers, and credit card numbers.
  - Personal Information about an Individual—such as full date of birth, mother's given name, email address, physical address, and telephone number.
  - Online/Technical Information—such as IP address, browser or device fingerprint, location data, and user IDs and passcodes used to gain access to online accounts.
  - Sensitive Information—such as fingerprints, voice or other biometric information, race, sexual orientation, medical, and health information.

2. **Limited Third-Party Disclosures of PCI .**

The parties and their attorneys shall take reasonable and appropriate measures to prevent the inadvertent disclosure of PCI.

The parties and their attorneys shall *not* include the foregoing PCI in motions, briefs, memoranda, pleadings, and other written submissions prepared by the parties, and shall not refer to this information in testimony, arguments, or statements on the record.

To the extent PCI is disclosed, the parties and their attorneys shall limit the use of PCI to the litigation of this Proceeding and shall not share or otherwise disseminate PCI to any person or entity other than the following categories of persons:

a. The parties to this Proceeding.

b. The parties' attorneys who have entered an appearance in this Proceeding and their staff.

c. Court reporters and videographers employed for any on-the-record interview or hearing in this Proceeding.

d. Persons providing copying or exhibit preparation services (including outside vendors hired to process electronically stored Documents).

e. Consultants, experts, and their staff to the extent they are deemed to be reasonably necessary for the prosecution or defense of this Proceeding.

f. Non-party witnesses who testify or are reasonably expected to testify at the hearing or at an on-the-record interview in this proceeding and their attorneys, on the condition that they are prohibited from disclosing or making use of any protected PCI that may be disclosed to them in the course of this Proceeding. Such witnesses and their attorneys may not retain Documents that contain PCI.

g. The authors, originators, and addressees of Documents containing the PCI.

h. The Office of Hearing Officers, its personnel and staff; the hearing panelists appointed in this disciplinary proceeding; FINRA's Office of General Counsel, its personnel and staff; and members of FINRA's National Adjudicatory Council.

i. Other persons upon order of the presiding hearing officer or FINRA's Chief Hearing Officer.

Before providing PCI to persons identified in categories d, e, or f above, a party (or a party's attorney) shall provide a copy of this Protective Order to the intended recipients, and shall caution them that they must comply with this Protective Order.

This Protective Order shall not restrict the use or disclosure by a party or a party's attorney of PCI such party or attorneys obtained independently of discovery in this Proceeding (whether or not such Documents or portions of Documents were also obtained through discovery in this Proceeding) or from disclosing their own PCI as they deem appropriate.

3. Obligations on Conclusion of Proceeding.

Respondent or his attorney shall within 60 days after the conclusion of this Proceeding either return to the Department of Enforcement all Documents and copies of Documents that contain PCI that the Department of Enforcement produced in this Proceeding, or certify to the Department of Enforcement that all such Documents and copies of such Documents have been securely destroyed.

Notwithstanding the foregoing, Respondent's attorneys may retain one copy of pleadings, briefs, motions, memoranda, correspondence exchanged in this Proceeding, hearing transcripts, admitted exhibits, and attorney work product created in the course of this Proceeding. All retained Documents containing PCI shall continue to be protected under this Protective Order.

4. Applicable Law Protecting PCI.

The parties are reminded that various state laws govern the use and dissemination of PCI. Nothing in this Order authorizes parties or their counsel to use or disseminate Documents containing PCI in a manner inconsistent with any applicable law.

SO ORDERED.

Megan P Davis

Megan P. Davis
Hearing Officer

Date: February 24, 2026

Copies to:

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