This Order has been published by FINRA's Office of Hearing Officers and should be cited as OHO Order 26-07 (2021071987902)

FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS

DEPARTMENT OF ENFORCEMENT, Complainant, v. SUTTER SECURITIES, INC. (CRD No. 30770), and KEITH CHARLES MOORE (CRD No. 5191450), Respondents.	Disciplinary Proceeding No. 2021071987902 Hearing Officer–MJD

ORDER STAYING PROCEEDING AND APPOINTING DEPUTY CHIEF HEARING OFFICER TO RESOLVE ISSUE REGARDING RULE 9910 COMPLIANCE

On January 20, 2026, FINRA's Department of Enforcement filed a Complaint against Respondents Sutter Securities, Inc., and Keith Charles Moore. Respondents' counsel, [redacted], with law firm [redacted], PC, filed their notices of appearance on February 11, along with another member of their firm. Because [redacted] are former FINRA employees, on February 12, Hearing Officer Michael Dixon issued an order directing [redacted] to file affidavits certifying their compliance with FINRA Rule 9910 (Post-Employment Conflict of Interest Restrictions; Nonpublic Information).

On February 17, 2026, [redacted] filed the affidavits. Both certified their belief that their involvement in the case complies with Rule 9910. In response to these affidavits, Enforcement requested a pre-hearing conference, which Hearing Officer Dixon held on February 24.

The parties disagree about whether Respondents' counsel's appearance complies with Rule 9910. In order to resolve this preliminary issue before proceeding with the substance of the case, I stay the underlying disciplinary proceeding; no further action will take place in the disciplinary case, including discovery, until the issue regarding compliance with Rule 9910 is resolved. The stay will remain in place until I issue an order lifting it.

To avoid possibly exposing Hearing Officer Dixon to tangential information related to the underlying disciplinary proceeding, I appoint Deputy Chief Hearing Officer Carla Carloni to resolve this distinct issue.

SO ORDERED.

Maureen A. Delaney
Chief Hearing Officer

Dated: February 25, 2026

Copies to:

[redacted]
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