

**Stipulated Award
FINRA Dispute Resolution Services**

In the Matter of the Arbitration Between:

Claimant

Wells Fargo Advisors Financial Network, LLC

Case Number: 21-00281

vs.

Respondent

Susan H. Lawrence

Hearing Site: Seattle, Washington

Awards are rendered by independent arbitrators who are chosen by the parties to issue final, binding decisions. FINRA makes available an arbitration forum—pursuant to rules approved by the SEC—but has no part in deciding the award.

Nature of the Dispute: Member vs. Associated Person

This case was decided by a majority-public panel.

REPRESENTATION OF PARTIES

For Claimant Wells Fargo Advisors Financial Network, LLC (“Claimant”): Amy O. Roberts, Esq., Jackson Walker L.L.P., Dallas, Texas.

For Respondent Susan H. Lawrence (“Respondent”): H. Troy Romero, Esq., Romero Park P.S., Bellevue, Washington.

CASE INFORMATION

Statement of Claim filed on or about: February 1, 2021.

Amended Statement of Claim filed on or about: February 18, 2021.

Claimant signed the Submission Agreement: February 1, 2021.

Statement of Answer filed by Respondent on or about: April 9, 2021

Respondent signed the Submission Agreement: May 14, 2021.

CASE SUMMARY

In the Statement of Claim and Amended Statement of Claim, Claimant asserted the following causes of action: breach of contract; unjust enrichment; money had and received; and conversion. The causes of action relate to a breach in the License Agreement between Claimant and Respondent.

In the Statement of Answer, Respondent denied the allegations made in the Amended Statement of Claim and asserted various affirmative defenses.

RELIEF REQUESTED

In the Statement of Claim and Amended Statement of Claim, Claimant requested:

1. Compensatory damages in the amount of \$308,166.45, as well as interest in that amount in accordance with applicable law;
2. Costs and expenses, including attorneys' fees, as agreed to under the License Agreement; and
3. All further relief, at law or equity, to which Claimant may be justly entitled.

In the Statement of Answer, Respondent requested:

1. Dismissal of Claimant's Amended Statement of Claim with prejudice and without costs;
2. Attorneys' fees and costs to the extent allowed by contract or applicable statute (if any); and
3. Such further relief as this Panel deems just and equitable.

OTHER ISSUES CONSIDERED AND DECIDED

The Arbitrators acknowledge that they have each read the pleadings and other materials filed by the parties.

On November 9, 2021, the parties filed a Motion for Entry of a Stipulated Award. On November 11, 2021, the Panel granted the motion.

The Stipulated Award in this matter may be executed in counterpart copies.

AWARD

The parties entered into an agreement to present to the Panel a Stipulated Award. Now, in lieu of a hearing and upon motion of both parties for entry of a Stipulated Award, and the written stipulation thereto, the Panel grants the motion and enters this Stipulated Award granting the following relief:

1. Respondent is liable for and shall pay to Claimant the sum of \$308,166.45 if, but only if, Respondent does not pay the lesser sum set forth in the Settlement Agreement and fails to timely cure any late payment, and deducted from this sum shall be any amounts paid by Respondent to Claimant under the Settlement Agreement; however, any action on this Award shall be subject to the provisions of the Settlement Agreement and this Award will only be enforced by Claimant should uncured default by Respondent occur as defined in the Settlement Agreement;
2. All outstanding fees and costs assessed against Claimant and Respondent by FINRA are each party's responsibility;
3. Claimant's claims in this case are dismissed with prejudice; and
4. Any claims by Respondent in this case are dismissed with prejudice.

FEES

Pursuant to the Code of Arbitration Procedure ("Code"), the following fees are assessed:

Filing Fees

FINRA Dispute Resolution Services will retain or collect the non-refundable filing fees* for each claim:

Initial Claim Filing Fee = \$ 2,125.00

**The filing fee is made up of a non-refundable and a refundable portion.*

Member Fees

Member fees are assessed to each member firm that is a party in these proceedings or to the member firm that employed the associated person at the time of the event giving rise to the dispute. Accordingly, as a party, Claimant is assessed the following:

Member Surcharge = \$ 1,900.00
Member Process Fee = \$ 3,750.00

Hearing Session Fees and Assessments

The Panel has assessed hearing session fees for each session conducted. A session is any meeting between the parties and the Arbitrators, including a pre-hearing conference with the Arbitrators, which lasts four (4) hours or less. Fees associated with these proceedings are:

One (1) pre-hearing session with the Panel @ \$1,125.00/session = \$ 1,125.00
Pre-Hearing Conference: June 7, 2021 1 session
Decision on the Papers = \$ 300.00

Total Hearing Session Fees = \$ 1,425.00

The Panel has assessed \$712.50 of the hearing session fees to Claimant.

The Panel has assessed \$712.50 of the hearing session fees to Respondent.

All balances are payable to FINRA Dispute Resolution Services and are due upon receipt.

ARBITRATION PANEL

Charles Scott McClellan	-	Public Arbitrator, Presiding Chairperson
David William Hickman	-	Public Arbitrator
Jeanne C Stilwell	-	Non-Public Arbitrator

I, the undersigned Arbitrator, do hereby affirm that I am the individual described herein and who executed this instrument, which is my award.

Concurring Arbitrators' Signatures

Charles Scott McClellan

Charles Scott McClellan
Public Arbitrator, Presiding Chairperson

11/23/2021

Signature Date

David William Hickman

David William Hickman
Public Arbitrator

11/22/2021

Signature Date

Jeanne C Stilwell

Jeanne C Stilwell
Non-Public Arbitrator

11/22/2021

Signature Date

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November 23, 2021

Date of Service (For FINRA Dispute Resolution Services use only)