

# Disciplinary and Other FINRA Actions

## Firm Fined, Individual Sanctioned

Letsgotrade, Inc. dba ChoiceTrade ([CRD #104021](#), East Brunswick, New Jersey) and Neville Golvala ([CRD #1710355](#), Carolina, Puerto Rico) June 9, 2023 – A Letter of Acceptance, Waiver and Consent (AWC) was issued in which the firm was censured and fined \$15,000 and Golvala was fined \$15,000 and suspended from association with any FINRA member in all capacities for three months. A lower fine was imposed on the firm after considering, among other things, its revenue and financial resources. Without admitting or denying the findings, the firm and Golvala consented to the sanctions and to the entry of findings that they negligently caused promotional materials to be disseminated that contained material misstatements and omissions in connection with two securities offerings for a holding company of the firm. The findings stated that the firm and Golvala engaged a third-party, who had previously been barred by the Securities and Exchange Commission (SEC) and NASD, to promote two offerings for the holding company. The third-party prepared slides, articles, and videos that were disseminated to potential investors via email and via hyperlinks on the crowdfunding portal offering pages. The slides, articles, and videos contained several material misstatements and omissions about the firm's business. The firm and Golvala negligently caused these promotional materials to be disseminated, which they should have known contained material misstatements and omitted material facts and should not have been distributed to potential investors.

The suspension is in effect from July 3, 2023, through October 2, 2023. ([FINRA Case #2019063434601](#))

## Firms Fined

RBC Capital Markets, LLC ([CRD #31194](#), New York, New York) June 5, 2023 – An AWC was issued in which the firm was censured and fined a total of \$135,000, of which \$67,500 is payable to FINRA. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it reported orders to FINRA with an inaccurate capacity code. The finding stated that the firm reported principal orders to trade reporting facilities from, among others, three internal accounts. However, the firm incorrectly marked the transactions from these accounts due to a coding error that flipped the reported capacity from principal to agency. As a result, the firm reported orders to the trade reporting facilities with an inaccurate capacity. In addition, the firm sent orders on its own behalf, as well as on behalf of certain affiliates, using one of its proprietary order management systems.

## Reported for August 2023

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).

### Search for FINRA Disciplinary Actions

All formal disciplinary actions are made available through a publicly accessible online search tool called FINRA Disciplinary Actions Online shortly after they are finalized.

Visit [www.finra.org/disciplinaryactions](http://www.finra.org/disciplinaryactions) to search for cases using key words or phrases, specified date ranges or other criteria.

Whether an order should be marked as principal, or agency depends on the terms of the agreement between the market center to which the order is routed and the entity on whose behalf the order was being routed. At various times, updates to the relevant agreements required the firm to change the capacity it reported for certain transactions. However, the firm failed to make corresponding updates to the order management system so that the correct capacity would be reported. Because the firm's reporting logic relied on these outdated settings, the firm reported orders to the trade reporting facilities with an inaccurate capacity. The findings stated that the firm had record-keeping violations due to the order memoranda for the above-referenced transactions including the incorrect capacity. For example, at times the order memoranda indicated that it was a principal transaction when it was an agency transaction, or vice versa. The findings also included that the firm supervised for the accuracy of the order capacities it reported with two exception reports. However, these exception reports did not include transactions from the proprietary order management system the firm used to route orders with an inaccurate capacity. As a result, the firm failed to identify these inaccuracies. The firm has since remediated this supervisory failure. ([FINRA Case #2020066722501](#))

**RBC CMA LLC ([CRD #121263](#), Nassau, Bahamas)**

June 5, 2023 – An AWC was issued in which the firm was censured and fined \$870,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it reported orders to FINRA with an inaccurate capacity code. The findings stated that the firm used a certain proprietary order management system to route orders to the market. Whether an order should be marked as principal or agency depends on the terms of the firm's agreement, if any, with the market center to which the order is routed. At various times, updates to the relevant agreements required the firm to change the capacity it reported for certain transactions. However, the firm failed to make corresponding updates to the order management system so that the correct capacity would be reported. Because the firm's reporting logic relied on these outdated settings, it reported orders to the trade reporting facilities with an inaccurate capacity. The findings stated that the firm had record-keeping violations due to the order memoranda for the above-referenced transactions including the incorrect capacity. For example, at times the order memoranda indicated that it was a principal transaction when it was an agency transaction, or vice versa. The findings also included that the firm failed to establish and maintain a supervisory system that was reasonably designed to achieve compliance with certain applicable securities laws and regulations, and FINRA rules, with respect to submission of accurate capacity codes on orders submitted to trade reporting facilities. Specifically, the firm did not have any procedures or reviews related to order capacity. As a result, the firm failed to identify over one billion orders with inaccurate capacity codes. The firm has since remediated the supervisory failure by implementing a daily order capacity review and making corresponding updates to its written supervisory procedures (WSPs). ([FINRA Case #2020068581801](#))

**UnionBanc Investment Services, LLC ([CRD #14455](#), Glendale, California)**

June 6, 2023 – An AWC was issued in which the firm was censured and fined \$75,000. 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 discovery obligations in an arbitration proceeding brought in FINRA's Dispute Resolution forum by a former registered representative (claimant). The findings stated that the claimant filed the arbitration against the firm for claims arising out of his termination from it. Prior to the hearing on the merits, the firm failed to comply with its discovery obligations. Specifically, the claimant served a request for production of documents seeking, among other things, emails related to the claimant's termination. The firm's initial response to that request provided a total of 11 pages of email, and the claimant moved to compel after the firm did not produce additional emails or agree on a protocol to search for additional emails. Later, the arbitrator ordered the firm to supplement its response, resulting in the production of thousands of additional responsive emails. However, the firm excessively redacted a significant portion of the emails based on improper privilege assertions. Subsequently, the arbitrator ordered the firm to remove most of the redactions and revise its privilege log. After the firm failed to revise its production, the arbitration panel issued a third order directing the firm to remove the redactions and found that the firm created unwarranted impediments to discovery that violated the rules of the arbitration forum. Ultimately, the firm complied by removing the email redactions. In an order, the panel awarded the claimant sanctions and attorney fees of \$35,000, which the firm subsequently paid. The claimant's substantive arbitration claims were ultimately denied after the hearing. ([FINRA Case #2022073798101](#))

**Charles Schwab & Co., Inc. ([CRD #5393](#), Westlake, Texas)**

June 8, 2023 – An AWC was issued in which the firm was censured and fined \$350,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it sent its customers transaction confirmations that omitted required disclosures regarding its customers' purchases of certain exchange traded notes (ETNs). The findings stated that the confirmations failed to disclose that the ETNs were callable, and that early redemption could affect the ETNs' yield. The firm relied on a third-party vendor to provide it with redemption information about securities, including ETNs and it used the redemption information in transaction confirmations it sent to customers. However, for some of the ETNs, the vendor provided inaccurate or incomplete information about redeemable ETNs, and for other ETNs, the firm received accurate redemption information from its vendor but inaccurately stated on transaction confirmations that the ETNs were not redeemable. The findings also stated that the firm failed to establish, maintain, and enforce a supervisory system, including WSPs, reasonably designed to achieve compliance with the rules concerning transaction confirmations for callable ETNs. The firm had no procedures to review the accuracy of the redemption features

of ETNs identified in the confirmations other than to compare the information to the data provided by its third-party vendor. In addition, the firm did not have any procedures to verify the information provided by its vendor concerning the ETNs' callability or redemption features. Ultimately, the firm identified that the ETN transaction confirmations did not contain the required redemption disclosures and subsequently self-reported the issue to FINRA and notified its customers of the correct redemption information. Subsequently, the firm revised its supervisory procedures to require firm personnel to validate ETN redemption data provided by the firm's vendor and to review ETN confirmation data for accuracy of redemption information. ([FINRA Case #2020068047101](#))

**TD Ameritrade Clearing, Inc. ([CRD #5633](#), Omaha, Nebraska)**

June 8, 2023 – 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 sent confirmations to customers who made purchases of ETNs and preferred securities that failed to disclose that, as the prospectuses for such products identified, the securities were subject to redemption and, with regard to ETNs, that redemption before maturity could affect the securities' yields. The findings stated that the firm instead relied upon general language within the confirmations it sent to customers that disclosed that if the transaction involved callable securities, the call features could affect yield and that complete information would be provided by the firm upon request. As a result, the confirmations did not disclose that the ETNs and preferred securities in question were in fact callable, and with respect to the ETNs purchased by the firm's customers, that early redemption could affect the securities' yields. Ultimately, the firm self-reported these failures to FINRA and voluntarily employed corrective action, including notifying its customers that the securities in question were callable, and with respect to the ETNs purchased by the firm's customers, that early redemption could affect the securities' yields. ([FINRA Case #2021070547501](#))

**Evercore Group L.L.C. ([CRD #42405](#), New York, New York)**

June 22, 2023 – An AWC was issued in which the firm was censured and fined \$100,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to establish, document, and maintain reasonably designed credit threshold controls. The findings stated that the firm provided market access to certain customers and generally assigned them to pre-defined, tiered credit limits based on each customer's largest notional value trading day for stocks priced over \$1 over a two-year period. In doing so, the firm did not sufficiently consider each customer's business, financial condition, trading patterns, or other information when setting credit threshold controls and frequently set credit limits that were too high to be effective. The findings also stated that the firm failed to establish, document, and maintain certain reasonably designed

erroneous order controls and procedures. The firm maintained single order quantity (SOQ) controls that were too high to prevent the entry of erroneous orders in certain securities. These included maximum share quantity and maximum order value controls, and a control setting the maximum percentage of a security's average daily volume at 100 percent. Moreover, the firm used uniform thresholds for all securities and did not consider the characteristics of individual securities. In addition, the firm's procedures did not explain, or did not adequately explain, its rationale for its decision to set the maximum share quantity and maximum order value limits at these levels. The firm also assigned certain customers SOQ thresholds that were not reasonable because they exceeded the customer's aggregate credit threshold. Further, the firm established a control that limited the maximum percentage away from the National Best Bid or Offer midpoint that a limit order could be priced. However, many of these price limits were not reasonably designed because they were set at prices that exchanges designate as clearly erroneous without related, complementary controls that would address related risks. In addition, the firm was unable to provide any documentation or sufficient rationale explaining or supporting these limit order price limits. The findings also included that the firm failed to establish, maintain, and enforce a reasonable supervisory system concerning the documentation of soft block reviews and control limit modifications. The firm's market access controls applied soft blocks to transactions that breached its risk management thresholds. However, the firm did not have any written procedures for reviewing orders that triggered a soft block. The firm's procedures did not reasonably describe the steps firm personnel must take when reviewing a subject order or the circumstances under which a soft block may be overridden or confirmed. The firm also did not, or did not sufficiently, contemporaneously document its review of soft blocks, including documenting the rationale for releasing the subject orders into the market. Furthermore, the firm's procedures did not reasonably describe how the firm supervises soft block alert reviews and did not specify how the firm's daily review of "overrides of blocks and alerts" was to be performed or provide other relevant details, such as the specific reports to be reviewed or how reviews should be documented. The firm also did not review overrides of blocks and daily alerts within a reasonable timeframe. In addition, the firm modified financial risk control parameters to allow orders to be routed without triggering soft block alerts. The firm had no procedures regarding when, and under what circumstances, a control parameter could be modified, and it generally did not maintain documentation relating to control limit modifications. FINRA found that the firm failed to establish a reasonable system for reviewing the effectiveness of its market access risk management controls and supervisory procedures. The firm did not test to determine whether the controls were effective in appropriately limiting the risk associated with its market access. ([FINRA Case #2017056128501](#))

**Credit Suisse Securities (USA) LLC ([CRD #816](#), New York, New York)**

June 23, 2023 – An AWC was issued in which the firm was censured and fined \$900,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to timely report transactions in Trade Reporting and Compliance Engine (TRACE)-eligible securities. The findings stated that the firm failed to timely report to TRACE transactions in securitized products, corporate debt, and agency debt securities. Most of these late reports, which ranged from a few minutes to several days late, had one of two root causes which were manual errors or omissions that delayed reports, or amendments not submitted in a timely manner. In addition, the firm's late reporting constituted a pattern or practice of late reporting without exceptional circumstances. The findings also stated that the firm submitted TRACE reports with inaccurate No Remuneration indicators for transactions in U.S. Treasury securities and securitized products. Due to coding errors, the inaccurate reports either failed to include the No Remuneration indicator or added the indicator when it did not apply. As a result of separate reviews, the firm identified each coding error within 18 to 30 months after the violations began and remediated each error. The firm submitted two self-reports to FINRA disclosing its inaccurate use of the No Remuneration indicator. The findings also included that the firm reported to TRACE trades in U.S. Treasury securities and securitized products that, due to the firm's coding error, inaccurately included the Non-Member Affiliate – Principal Transaction (NMAPT) indicator. The firm identified the coding error 32 months after the violations began and remediated it. Further, the firm self-reported to FINRA its inaccurate use of the NMAPT indicator. FINRA found that the firm reported to TRACE trade reports in corporate bonds with inaccurate contra-party identifiers. The firm also reported to TRACE trade reports in U.S. Treasury securities and securitized products with inaccurate execution times. The firm corrected the coding errors that caused these inaccurate reports and in two separate self-reports disclosed to FINRA its reporting of inaccurate execution times on certain U.S. Treasuries trade reports. FINRA also found that the firm failed to timely notify FINRA of new issue offerings in TRACE-eligible asset-backed securities, an error rate exceeding five percent of the firm's new issue submissions in TRACE-eligible asset-backed securities. In addition, FINRA determined that the firm's supervisory system was not reasonably designed to achieve compliance with TRACE reporting rules. The firm's TRACE supervisory reviews identified a high number and percentage of late trade reports in securitized products and in corporate bonds. The firm, however, did not fully address or remediate the underlying causes for the delayed reports, erroneous reports, and reports requiring subsequent amendments that resulted in its late reporting. Instead, the firm established internal late error rate targets for securitized products and corporate bond reporting that were too high to address its ongoing pattern of late trade reporting. Further, the firm did not have a supervisory system, including WSPs, to review the timeliness of notices it provided to FINRA of new issue offerings. ([FINRA Case #2018060924101](#))

**BGC Financial, L.P. (CRD #19801, New York, New York)**

June 27, 2023 – An AWC was issued in which the firm was censured and fined \$50,000. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it failed to include two proprietary accounts in calculations of its overall net position in equity securities (e.g., “short” or “long”) being sold, which ultimately caused certain orders to be mismarked under Regulation SHO Rule 200(g) of the Securities Exchange Act of 1934. The findings stated that this occurred because the firm aggregated the accounts into independent trading units, even though it did not create a written plan of organization that identified the aggregation units, specified their trading objectives, and supported their independent identities, pursuant to Regulation SHO Rule 200(f)(1). As a result, proprietary accounts did not qualify for independent treatment, and the firm’s order management system incorrectly excluded their positions when calculating the firm’s net position in securities, resulting in the firm mismarking trades. The findings also stated that the firm failed to establish, maintain, and enforce a supervisory system reasonably designed to achieve compliance with Rule 200(f) and (g). The firm did not take any steps to verify that its order management system was achieving compliance with Regulation SHO. For example, the firm did not conduct regular order-marking reviews. In addition, the firm’s WSPs did not contain descriptions of any process to ensure compliance with Rule 200 and did not identify any individual responsible for such compliance. Following FINRA’s cycle examination, the firm undertook an internal audit of its trading desks, implemented new procedures for reviewing order marking, revised its WSPs, and modified its procedures to include written plans of organization for the desks. ([FINRA Case #2018060678201](#))

**Open to the Public Investing, Inc. (CRD #127818, New York, New York)**

June 27, 2023 – 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 failed to meet its best execution obligations. The findings stated that the firm did not conduct reasonable reviews of the execution quality of its customers’ orders. Further, the firm’s reviews of its customers’ execution quality were limited to reviewing its clearing firm’s quarterly reports prepared pursuant to Rule 606 under the Exchange Act. These reports did not provide any data specific to the firm’s execution quality or the quality of the executions it could have obtained from competing markets. The findings also stated that the firm failed to establish and maintain a supervisory system, including WSPs, reasonably designed to achieve compliance with its best execution obligations. The firm’s supervisory reviews were not reasonably designed to evaluate whether the firm was meeting its best execution obligations, and its WSPs did not provide any procedures for conducting execution quality reviews. The firm’s WSPs were not tailored to the firm’s business. The WSPs did not address equity trading, even though the firm only provided equity trading. Instead, the WSPs addressed best

execution obligations for fixed-income securities, which the firm did not offer. As such, the procedures did not provide guidance as to how the firm should conduct execution quality reviews for its business. The findings also included that the firm failed to disclose in writing at account opening or annually thereafter that it received payment for order flow through its routing arrangements. FINRA found that the firm disseminated retail communications that contained misleading statements. ([FINRA Case #2020065340901](#))

**Hightower Securities, LLC ([CRD #116681](#), Chicago, Illinois)**

June 30, 2023 – An AWC was issued in which the firm was censured, fined \$100,000, ordered to pay \$133,600, plus interest, in partial restitution to customers that purchased limited partnership interests in an offering related to GPB Capital Holdings, LLC, ordered to pay \$119,577.40, plus interest, in restitution to customers that purchased an alternative mutual fund, and required to remediate the issues identified in the AWC pertaining to alternative mutual funds and implement a supervisory system, including WSPs, reasonably designed to achieve compliance with FINRA Rule 3110 and 2010. The amount of partial restitution being paid to GPB Capital customers is equal to the commissions that the firm received in connection with these customers' investments. Without admitting or denying the findings, the firm consented to the sanctions and to the entry of findings that it negligently failed to tell investors in an offering related to GPB Capital that the issuer failed to timely make required filings with the SEC, including filing audited financial statements. The findings stated that while the firm received letters from the issuer notifying it of the delays and its stated intention to complete a forensic audit, the firm sold limited partnership interests in an offering related to GPB Capital after that announcement. The principal value of those sales totaled \$1,670,000 and the firm received a total of \$133,600 in commissions from the sales. However, in connection with these sales the firm did not inform the customers that the company had not timely filed its audited financial statements with the SEC or the reasons for the delay. The delay in filing audited financial statements and the reasons for it was material information that should have been disclosed. In February 2021, the SEC filed a complaint against GPB Capital and other defendants alleging, among other things, that the defendants engaged in securities fraud in violation of Section 10(b) of the Exchange Act and Rule 10b-5 promulgated thereunder (Case No. 1:21-cv-00583, E.D.N.Y.). The United States Department of Justice also brought criminal charges against GPB Capital's founder and chief executive officer and two other executives, charging, among other things, securities fraud, mail fraud and wire fraud (Case No. 1:21-cr-54, E.D.N.Y.). The AWC findings also stated that the firm failed to reasonably supervise certain representatives' recommendations of an alternative mutual fund. The firm permitted the sale of the alternative mutual fund on its platform without having WSPs requiring the firm to conduct due diligence on alternative mutual funds to ensure that the firm and its representatives had a sufficient understanding of the product's unique



risks and features, including the fact that the fund pursued a risky strategy that relied, in part, on purchasing uncovered options. The findings also included that the firm lacked a reasonable supervisory system to review its representatives' recommendations of the alternative mutual fund. The firm's representatives sold \$190,000 in the alternative mutual fund to customers. The mutual fund's value dropped 80 percent during an extreme volatility event, and it ultimately liquidated and closed, resulting in thousands of dollars in losses for those customers. ([FINRA Case #2018060896601](#))

## Individuals Barred

### **Jeffrey Max Cohen (CRD #2528929, Panama City Beach, Florida)**

June 5, 2023 – An AWC was issued in which Cohen was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Cohen consented to the sanction and to the entry of findings that he declined to produce information or documents requested by FINRA during the course of its investigation that originated from allegations regarding the sale of securities through one of his prior outside business activities (OBAs) in an arbitration matter disclosed on his Uniform Application for Securities Industry Registration or Transfer (Form U4). ([FINRA Case #2020067277901](#))

### **Scott Jay Matalon (CRD #4637378, Boynton Beach, Florida)**

June 6, 2023 – An AWC was issued in which Matalon was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Matalon consented to the sanction and to the entry of findings that he refused to provide documents and information requested by FINRA in connection with its investigation of allegations made in a statement of claim filed against his member firm by one his clients. ([FINRA Case #2023078170101](#))

### **Joanna L. Morgan (CRD #7252494, Atoka, Tennessee)**

June 6, 2023 – An AWC was issued in which Morgan was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Morgan consented to the sanction and to the entry of findings that she refused to provide information and documents requested by FINRA in connection with its investigation into the circumstances giving rise to a Uniform Termination Notice for Securities Industry Registration (Form U5) filed by her member firm. The findings stated that the firm filed the Form U5 stating that it had discharged Morgan for altering health-related information on an insurance application. ([FINRA Case #2023077766801](#))

**Jermaine K. Benjamin ([CRD #6152653](#), Riverview, Florida)**

June 7, 2023 – An AWC was issued in which Benjamin was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Benjamin consented to the sanction and to the entry of findings that he refused to provide documents and information requested by FINRA in connection with its investigation into the circumstances giving rise to an amended Form U5 filed by his member firm. The findings stated that the amended Form U5 disclosed that the firm had received a written customer complaint alleging unauthorized transactions and misappropriation/defalcation by Benjamin while he was associated with the firm. ([FINRA Case #2022075106101](#))

**Sean Pong ([CRD #2406530](#), Long Beach, California)**

June 7, 2023 – An AWC was issued in which Pong was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Pong 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 his OBA. The findings stated that the investigation originated from FINRA's review of a disclosure filed by Pong's member firm that stated that the firm had become aware of allegations from a former customer related to the OBA. ([FINRA Case #2021072053201](#))

**D. Wray Rodgers ([CRD #2842993](#), Collierville, Tennessee)**

June 7, 2023 – An AWC was issued in which Rodgers was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Rodgers 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 whether he engaged in an OBA without providing prior written notice to his member firm and whether he misused customer funds. ([FINRA Case #2023078315401](#))

**Roger Lee Arnold ([CRD #5284151](#), Salem, Oregon)**

June 12, 2023 – An Office of Hearing Officers (OHO) decision became final in which Arnold was barred from association with any FINRA member in all capacities. The sanction was based on findings that Arnold failed to provide information and documents requested by FINRA during the course of an investigation that originated from a Form U5 filed by his member firm that disclosed that Arnold had resigned from the firm while it investigated one or more unauthorized redemptions and transfers of funds from his wife's account with the firm. The findings stated that the Form U5 stated that Arnold admitted to redeeming money from his wife's account with the firm and transferring it to a joint bank account without his wife's permission. Arnold resigned from the firm while he was under review by it. ([FINRA Case #2021072142202](#))

**Andrew M. Komarow (CRD #5838564, Avon, Connecticut)**

June 15, 2023 – An AWC was issued in which Komarow was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Komarow consented to the sanction and to the entry of findings that he refused to provide on-the-record testimony and to produce documents and information requested by FINRA in connection with its investigation into the circumstances giving rise to a Form U5 filed by his member firm. The findings stated that the firm filed the Form U5 disclosing that it had terminated Komarow for processing Automated Clearing House (ACH) instructions for his own account knowing there were insufficient funds, then improperly using credit to place trades, resulting in a negative balance. Subsequently, the firm filed an amended Form U5 disclosing that its internal review had concluded that Komarow had caused a personal account to be opened and ACH instructions to be processed, knowing accounts had insufficient funds and used credited funds to engage in trading that generated losses in the personal account, prior to the firm receiving ACH rejection due to insufficient funds. In response to its requests, Komarow produced certain documents to FINRA, but he did not respond fully to its request for documents and information. Ultimately, Komarow neither produced the additional requested documents and information nor appeared to provide on-the-record testimony. ([FINRA Case #2022077422401](#))

**Edward Beyn (CRD #5406273, Dix Hills, New York)**

June 19, 2023 – An SEC decision became final in which Beyn was barred from association with any FINRA member in all capacities. The SEC affirmed the findings and the sanction imposed by the National Adjudicatory Counsel (NAC). The sanction was based on the findings that Beyn engaged in excessive trading in customer accounts over which he exercised *de facto* control. The findings stated that *de facto* control over customer accounts was established when nearly all the relevant trades were solicited, and the customers testified that they acquiesced routinely to Beyn's recommendations and relied on his expertise. The findings also stated that Beyn acted with scienter and, accordingly, churned the accounts in violation of Section 10(b) of the Exchange Act and Rule 10b-5 promulgated thereunder. Beyn misled his customers about the true costs of their trading, which along with excessively high cost-to-equity ratios rendered it virtually impossible for the customers to profit from the trading. Beyn received \$647,648 from the trading, deceived a customer about the importance of new account forms, and misrepresented on active account worksheets that his customers were "happy," "satisfied," or "very satisfied" with the performance in their accounts despite the losses. The findings also included that Beyn recommended three unsuitable ETNs to a 65-year-old customer. The ETNs were risky products for sophisticated investors and likely to decrease in value if held for more than short terms. Although the customer was an inexperienced investor, Beyn did not explain the risks, and the positions were held for long terms and resulted in losses of \$42,498 from one of the ETNs and more than \$20,000 from the other ETNs. Further, Beyn concentrated the customer's limited retirement funds in the ETNs, placing 20 percent of his account in one of the ETNs and then 100 percent in the other ETNs. ([FINRA Case #2015044823502](#))

**Richard Martel Funderburk (CRD #6129027, Rock Hill, South Carolina)**

June 21, 2023 – An AWC was issued in which Funderburk was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Funderburk consented to the sanction and to the entry of findings that after failing the Securities Industry Essentials Exam (SIE), he sent an instant message to his supervisor in which he falsely informed her that he had passed the exam and provided her with a fabricated SIE exam score report reflecting a passing score.

([FINRA Case #2022075036001](#))

**Kimberly A. Sittarich (CRD #4497728, Janesville, Wisconsin)**

June 21, 2023 – An AWC was issued in which Sittarich was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Sittarich consented to the sanction and to the entry of findings that she refused to provide documents and information or appear for on-the-record testimony requested by FINRA in connection with an investigation into the circumstances giving rise to her termination from her member firm.

([FINRA Case #2022075569501](#))

**Randall George Skrabonja (CRD #1858245, Juno Beach, Florida)**

June 26, 2023 – An AWC was issued in which Skrabonja was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Skrabonja consented to the sanction and to the entry of findings that he refused to provide documents and information requested by FINRA in connection with its investigation of the circumstances surrounding his termination from his member firm. The findings stated that the firm had filed a Form U5 stating that it had discharged Skrabonja for selling away without firm approval.

([FINRA Case #2023078789801](#))

**Jonathan Walter Way (CRD #1126849, Santa Rosa, California)**

June 29, 2023 – An AWC was issued in which Way was barred from association with any FINRA member in all capacities. Without admitting or denying the findings, Way consented to the sanction and to the entry of findings that he refused to provide documents and information requested by FINRA in connection with its investigation. The findings stated that this matter originated from FINRA's review of a Form U5 filed by Way's member firm that stated that he was permitted to resign while under internal review for potential sales practice violations. Way responded to FINRA's initial request, however, he ultimately refused to produce the information and documents requested.

([FINRA Case #2022076025501](#))

## Individuals Suspended

### **Delaina Sue Kucish ([CRD #4401092](#), Fairmont, West Virginia)**

June 1, 2023 – An AWC was issued in which Kucish was assessed a deferred fine of \$15,000 and suspended from association with any FINRA member in all capacities for 15 months. Without admitting or denying the findings, Kucish consented to the sanctions and to the entry of findings that she caused her member firm to fail to preserve required books and records by using unauthorized text messages on her personal cell phone to transmit client documents to another associated person at the firm on multiple occasions. The findings stated that Kucish did not disclose her use of personal text messages to the firm or provide it with copies of her text messages. The findings also stated that Kucish provided false information to her firm by telling a firm investigator that she did not send any client information or documents to another associated person at the firm via text message, which was false. The findings also included that Kucish provided false information to FINRA by submitting a written response to a FINRA request that contained false or misleading information, including a false denial that she ever sent client documents via text message to another associated person at the firm. Kucish subsequently admitted in a written response to another FINRA request that she had, in fact, done so.

The suspension is in effect from June 5, 2023, through September 4, 2024. ([FINRA Case #2021072548702](#))

### **Adam C. Ellison ([CRD #6073346](#), Rocklin, California)**

June 5, 2023 – An AWC was issued in which Ellison 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, Ellison consented to the sanctions and to the entry of findings that he willfully failed to timely amend his Form U4 to disclose that he had been charged with a felony. The findings stated that while Ellison was associated with his member firm, the District Attorney of the County of Nevada (California) filed with the California Superior Court a felony complaint against him. Ellison became aware of the felony charge the following month and was required to amend his Form U4 within 30 days to disclose the charge. However, Ellison did not disclose the felony charge on his Form U4 until approximately four months later.

The suspension is in effect from June 5, 2023, through September 4, 2023. ([FINRA Case #2022074931701](#))

**Jeremy Jefferson Jacobson (CRD #4437801, Metairie, Louisiana)**

June 6, 2023 – An AWC was issued in which Jacobson was assessed a deferred fine of \$5,000, suspended from association with any FINRA member in all capacities for three months and ordered to pay deferred disgorgement of commissions received in the amount of \$7,887, plus interest. Without admitting or denying the findings, Jacobson consented to the sanctions and to the entry of findings that he executed trades with a total principal value of approximately \$1.1 million in his customers' non-discretionary brokerage accounts without the customers' authorization or consent for the trades. The findings stated that Jacobson received \$7,887 in total commissions for the trades.

The suspension is in effect from June 20, 2023, through September 19, 2023. ([FINRA Case #2021071954502](#))

**Kale KH Young (CRD #2270954, Redondo Beach, California)**

June 8, 2023 – An AWC was issued in which Young was fined \$5,000 and suspended from association with any FINRA member in all capacities for 20 business days. Without admitting or denying the findings, Young consented to the sanctions and to the entry of findings that he falsified the signatures of three customers of his member firm on firm forms with the customers' permission. The findings stated that Young re-used one of the customer's previously obtained genuine signature on account transfer forms. Young also re-used that customer's and another customer's previously obtained genuine signature on mutual fund replacement forms. Further, Young affixed a copy of a third customer's signature to a life insurance product acknowledgement form. In each instance, the customers did not sign the documents but authorized Young to affix or re-use their signatures. Young also falsely stated on an annual compliance questionnaire that he had not signed or affixed any other person's signature on a document. The firm used all but one of the falsified documents to authorize and record the sale, transfer, or disbursement of cash or securities from the customers' accounts. As a result of this conduct, Young caused his firm to maintain inaccurate books and records.

The suspension was in effect from July 3, 2023, through July 31, 2023. ([FINRA Case #2020066352101](#))

**Sharon Hayut (CRD #5552070, New York, New York)**

June 13, 2023 – An AWC was issued in which Hayut was assessed a deferred fine of \$10,000 and suspended from association with any FINRA member in all capacities for four months. Without admitting or denying the findings, Hayut consented to the sanctions and to the entry of findings that she accepted two monetary gifts totaling \$50,815 from a senior customer, one of her long-time clients, in violation of her member firm's policies. The findings stated that both checks were issued from one

of the customer's accounts at the firm and were made payable to the synagogue to which Hayut belonged. The funds from the checks were applied to Hayut's account and were used to pay for various expenses. Hayut's acceptance of these gifts violated the firm's gift policies. Hayut was aware of the firm's gift policies and did not disclose her acceptance of the checks to it. In addition, after accepting the first check, Hayut incorrectly answered "no" to a question on her annual compliance questionnaire regarding whether she had received a gift from a customer valued at over \$100 within the last 12 months.

The suspension is in effect from June 20, 2023, through October 19, 2023. ([FINRA Case #2021073217601](#))

**Brody Ralph Bray ([CRD #4727529](#), Jefferson, Georgia)**

June 14, 2023 – An AWC was issued in which Bray was assessed a deferred fine of \$10,000 and suspended from association with any FINRA member in all capacities for six months. Without admitting or denying the findings, Bray consented to the sanctions and to the entry of findings that he engaged in OBAs without providing prior written notice to his member firm. The findings stated that Bray became an independent contractor for a company that provides subscription-based, investment content for a fee. Bray received \$77,500 in compensation from the company for his services, which included providing the company with investment and trade-related analysis and communications. Bray also did not provide his firm prior written notice of his outside activities with two additional limited liability companies he formed. In addition, Bray conducted his company-related activities under a pseudonym and falsely attested on a firm annual compliance questionnaire that he had not engaged in any undisclosed OBAs. The findings also stated that the investment-related content Bray provided to the company was sent to its subscribers. These investment-related communications with the public violated the content standards of FINRA Rule 2210 because they contained exaggerated, unwarranted, promissory, and/or misleading statements or claims.

The suspension is in effect from June 20, 2023, through December 19, 2023. ([FINRA Case #2021072323701](#))

**Colin Jeremiah Healy ([CRD #4672687](#), Amherst, New York)**

June 14, 2023 – An AWC was issued in which Healy was assessed a deferred fine of \$10,000 and suspended from association with any FINRA member in all capacities for one year. Without admitting or denying the findings, Healy consented to the sanctions and to the entry of findings that he improperly used his member firm's funds by submitting \$6,139.28 in personal expenses to it for reimbursement as business expenses. The findings stated that part of Healy's work involved meeting business contacts at private clubs. These clubs charged Healy's corporate credit card

for all charges incurred during this time. Healy incurred personal expenses at these clubs in the amount of \$6,139.28, which were charged to his corporate credit card, in addition to business expenses. The personal expenses included charges such as \$277.31 for “pool lessons” and \$360 for “tennis clinics.” Healy then submitted the charges from the clubs, which included both his personal and business expenses, to the firm for reimbursement as business expenses. The firm then reimbursed Healy for the personal expenses.

The suspension is in effect from June 20, 2023, through June 19, 2024. ([FINRA Case #2021071901901](#))

**Richard F. Spettell (CRD #1686392, Brooklyn, New York)**

June 15, 2023 – An AWC was issued in which Spettell was fined \$2,500 and suspended from association with any FINRA member in all capacities for one month. Without admitting or denying the findings, Spettell consented to the sanctions and to the entry of findings that he caused his member firm to maintain inaccurate books and records by changing the representative code for trades, causing the trade confirmations to show an inaccurate representative code. The findings stated that Spettell entered into an agreement through which he agreed to service certain customer accounts, including executing trades for those accounts, under a joint representative code that he shared with the estate of a former representative. The agreement set forth what percentages of the commissions the former representative’s estate and Spettell would earn on trades placed using the joint representative code. Spettell placed trades in accounts that were covered by the agreement using his own personal representative code. Although the firm’s system correctly prepopulated the trades with the applicable joint representative code, Spettell changed the code for the trades to his personal representative code. Spettell mistakenly assumed that he had permission to change the representative code in this manner based on his understanding of a prior informal arrangement he had with the former representative. However, Spettell did not confirm with the former representative’s estate that his understanding was correct or that Spettell could change the representative code for the transactions at issue. As a result, the firm’s trade confirmations for the trades inaccurately reflected Spettell’s personal representative code instead of the joint representative code that Spettell shared with the former representative’s estate. Spettell’s actions resulted in his receiving higher commissions from the trades than what he was entitled to receive pursuant to the agreement. Subsequently, the firm reimbursed the estate of the representative.

The suspension is in effect from July 17, 2023, through August 16, 2023. ([FINRA Case #2021070569901](#))



**Thomas Alvin Vernor III (CRD #1277533, Huntsville, Alabama)**

June 15, 2023 – An AWC was issued in which Vernor was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for five months. Without admitting or denying the findings, Vernor consented to the sanctions and to the entry of findings that he willfully failed to amend his Form U4 to disclose a felony charge. The findings stated that although Vernor knew he was required to disclose the felony charge, he chose, voluntarily, to never disclose it on his Form U4.

The suspension is in effect from June 20, 2023, through November 19, 2023. ([FINRA Case #2023078087101](#))

**Michelle Liao Wu (CRD #3046373, San Jose, California)**

June 16, 2023 – An AWC was issued in which Wu was assessed a deferred fine of \$5,000 and suspended from association with any FINRA member in all capacities for 20 business days. Without admitting or denying the findings, Wu consented to the sanctions and to the entry of findings that she placed discretionary trades in customers' brokerage accounts without written authority to do so. The findings stated that these customers did not provide prior written authorization for Wu to exercise discretion in their accounts and her member firm prohibited registered representatives from exercising discretion in customer accounts except under very limited circumstances, which are inapplicable here.

The suspension was in effect from June 20, 2023, through July 18, 2023. ([FINRA Case #2022074969501](#))

**Jason K. Adams (CRD #2217759, Smyrna, Georgia)**

June 20, 2023 – An AWC was issued in which Adams 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, Adams consented to the sanctions and to the entry of findings that he engaged in an OBA without providing prior written notice to his member firms. The findings stated that Adams formed and began operating a company that provided subscription-based, investment content for a fee. Adams conducted the activities under a pseudonym and was the sole owner of the company and was responsible for its day-to-day operations. Adams obtained a federal employer identification number and business bank account for the company, managed the company's payments to and relationships with vendors, and recruited two individuals to prepare content for dissemination to the company's subscribers. The company generated \$77,500 in compensation for Adams.

The suspension is in effect from June 20, 2023, through September 19, 2023. ([FINRA Case #2023078823301](#))

**Blake Adam Levy (CRD #4593636, Parkland, Florida)**

June 20, 2023 – An AWC was issued in which Levy 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, Levy consented to the sanctions and to the entry of findings that he recommended that customers purchase membership interests in two funds for \$2,260,299 through two private placement offerings, without having a reasonable basis to make those recommendations. The findings stated that Levy did not perform reasonable diligence on the funds before recommending them to customers and failed to understand the risks related to the investments. This failure stemmed, in part, from Levy's negligent review of the offering materials, which was cursory and only aimed at giving himself a high-level understanding of the offering terms. The findings also stated that Levy made negligent omissions in connection with the sale of membership interests in the funds, in violation of FINRA Rule 2010, both independently and in contravention of Section 17(a)(2) of the Securities Act of 1933. When he sold membership interests in the funds to customers, Levy negligently failed to inform them about his role in the management company that managed the funds and the sources of his potential compensation. Levy also used offering materials that did not disclose these material facts. Levy was one of two equal owners in the management company that managed the funds and, in that capacity, was entitled to compensation from three sources: the management fees, the placement agent fees, and the performance fees. Neither the offering materials nor Levy disclosed that these fees would not be paid entirely to the placement agent, but instead would be divided among the placement agent, the management company, and the selling broker. Levy, by virtue of his role in the management company and as a selling broker, was entitled to receive a portion of the placement agent fees. Because Levy never fully reviewed the offering materials, he was incapable of correcting the omissions therein.

The suspension is in effect from June 20, 2023, through October 19, 2023. ([FINRA Case #2018057457401](#))

**Abbe Jan Wollins (CRD #5237027, Del Ray Beach, Florida)**

June 20, 2023 – An AWC was issued in which Wollins was assessed a deferred fine of \$5,000, suspended from association with any FINRA member in all capacities for three months and ordered to pay deferred disgorgement of commissions received in the amount of \$2,448.60, plus interest. Without admitting or denying the findings, Wollins consented to the sanctions and to the entry of findings that he recommended that two customer accounts invest in limited partnerships formed to acquire and develop oil and gas properties without having a reasonable basis to believe those speculative, illiquid, and long-term investments were suitable for the customers. The findings stated that the accounts were held by a retired married

couple who were approximately 82-years-old, and receiving pension and social security benefits and savings, and by a 93-year-old customer that received social security benefits and took required withdrawals from an Individual Retirement Account. Wollins' recommendations that these customers invest in the energy partnerships were not suitable given their investment profiles. Wollins received \$2,448.30 in commissions from these investments.

The suspension is in effect from June 20, 2023, through September 19, 2023. ([FINRA Case #2019063686205](#))

**Rogério T. Almeida ([CRD #7083841](#), Winter Garden, Florida)**

June 27, 2023 – An AWC was issued in which Almeida 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, Almeida consented to the sanctions and to the entry of findings that he conducted OBAs as a mortgage loan officer without providing prior written notice to his member firm. The findings stated that Almeida earned \$35,026 in commissions from those activities. Ultimately, Almeida submitted an OBA form to the firm, disclosing that he had a mortgage license with a mortgage company and inaccurately stating he was not working as a loan officer. Although the firm rejected the OBA, Almeida continued to work as a loan officer.

The suspension is in effect from July 3, 2023, through September 2, 2023. ([FINRA Case #2022076195901](#))

**Ricky Alan Mantei ([CRD #1098981](#), Columbia, South Carolina)**

June 27, 2023 – Mantei appealed a NAC decision to the SEC. Mantei was fined \$15,000, suspended from association with any FINRA member in all capacities for six months and required to requalify by examination as a general securities representative. The NAC affirmed the findings and modified the sanctions imposed by the OHO. The sanctions were based on findings that Mantei violated his member firm's prearranged trading prohibition and circumvented its cross-trade procedures by directing prearranged trading with intermediaries in order to facilitate and disguise cross trades. The findings stated that Mantei sold two customers' positions in structured certificates of deposit and another customer's position in a municipal bond. Mantei did not sell these instruments directly from one customer to another in compliance with the firm's cross trade procedures, nor did he sell the instruments out to the market in bona fide transactions. Instead, Mantei engineered a plan to sell the customers' financial instruments to other firm customers without it appearing that he had engaged in cross trades. Under the plan, Mantei arranged for external third parties to buy each selling customer's investment with the understanding that he would have the firm repurchase it a short time later. After Mantei caused the firm

to repurchase the investments, he then sold them to other firm customers. Each set of transactions was, in substance, a cross trade between firm customers, which was prohibited by his firm's written supervisory procedures. Mantei's conduct violated FINRA Rule 2010 and breached his duty of fair dealing relating to the municipal bond trades in willful violation of Municipal Securities Rulemaking Board (MSRB) Rule G-17.

The sanctions are not in effect pending the review. ([FINRA Case #2015045257501](#))

**Maurice Lawrence Naylor III (CRD #831841, Williamsville, New York)**

June 27, 2023 – An AWC was issued in which Naylor was fined \$5,000 and suspended from association with any FINRA member in all capacities for 45 business days. Without admitting or denying the findings, Naylor consented to the sanctions and to the entry of findings that he engaged in an OBA as the owner of a company that offered structured settlements even though his member firm did not approve his request to participate in the OBA. The findings stated that, although the firm did not approve his request, Naylor continued to own and operate the company. In addition, Naylor sat on the company's Board of Directors, and served as its Vice President, Secretary, and Treasurer. During that same time, Naylor also appeared on the company's marketing materials and engaged with its clients regarding potential business. Naylor also falsely certified on annual compliance questionnaires that he had not engaged in any OBAs that were not approved by the firm.

The suspension is in effect from July 17, 2023, through September 18, 2023. ([FINRA Case #2021071098801](#))

**Douglas Blake Solinsky (CRD #4715268, Cortlandt, New York)**

June 29, 2023 – An AWC was issued in which Solinsky was fined \$10,000, suspended from association with any FINRA member in all capacities for four months and ordered to pay \$27,622, plus interest, in restitution to customers. Without admitting or denying the findings, Solinsky consented to the sanctions and to the entry of findings that he excessively and unsuitably traded two customer accounts. The findings stated that a 71-year-old customer routinely followed Solinsky's recommendations. Although the customer's account had an average month-end equity of approximately \$64,750 for 12 months, Solinsky recommended purchases with a total principal value of approximately \$601,000, which resulted in an annualized turnover rate in the account just over nine. This trading resulted in an annualized cost-to-equity ratio of just over 26 percent—meaning the customer's investments had to grow by more than 26 percent just to break even. As a result of Solinsky's unsuitable recommendations, the customer paid \$16,593 in commissions and fees. Furthermore, a married couple, a 63-year-old plumber and a 63-year-old teacher's assistant, routinely followed Solinsky's recommendations for their account. Although the married couple's account had an average month-end equity

of approximately \$38,700 for 12 months, Solinsky recommended purchases with a total principal value of approximately \$364,000, which resulted in an annualized turnover rate in the account over nine. This trading resulted in an annualized cost-to-equity ratio of 29.25 percent—meaning the married couple's investments had to grow by 29.25 percent just to break even. As a result of Solinsky's unsuitable recommendations, the married couple paid \$11,029 in commissions and fees.

The suspension is in effect from July 17, 2023, through November 16, 2023. ([FINRA Case #2019064511203](#))

## Complaint 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 the allegations in the complaint.

### **James Anthony Iannazzo (CRD #2807988, Southport, Connecticut)**

June 23, 2023 – Iannazzo was named a respondent in a FINRA complaint alleging that he repeatedly structured cash deposits and withdrawals in bank and brokerage accounts for the purpose of causing the financial institutions to fail to file a Currency Transaction Report (CTR). The complaint alleges that Iannazzo divided cash transactions over \$10,000 into smaller deposits or withdrawals conducted over several days at the same bank, and often conducted the transactions at different branches of the same bank. Iannazzo also frequently withdrew more than \$10,000 in cash on a single day through transactions conducted at two different financial institutions. In total, Iannazzo structured 71 cash deposits and withdrawals totaling \$568,440 in two personal bank accounts and 297 ATM deposits and withdrawals totaling \$277,450 in an account at his member firm. Iannazzo structured these cash transactions to avoid conducting a single deposit or withdrawal over \$10,000 at a financial institution, which would require the financial institution to file a CTR. Iannazzo engaged in this conduct despite receiving training on money laundering and structuring from his firm and pamphlets describing CTRs and structuring from one of the banks. ([FINRA Case #2020067734001](#))

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**Firm Expelled for Failure to Provide Information or Keep Information Current Pursuant to FINRA Rule 9552**

**The Transportation Group (Securities) Limited (CRD #286288)**  
New York, New York  
(June 21, 2023)

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**Firms Cancelled for Failure to Pay FINRA Dues, Fees and Other Charges Pursuant to FINRA Rule 9553**

**Carver Cross Securities Corp. (CRD #44722)**  
Canaan, New York  
(June 7, 2023)  
FINRA Case #20230789323/DFC230001

**Stormharbour Securities LP (CRD #35997)**  
New York, New York  
(June 5, 2023)

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**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.)

**Joshua Brandon Lovings (CRD #7142691)**  
Alton, Illinois  
(June 6, 2023)  
FINRA Case #2022074958001

**Harold David Stephenson (CRD #1056942)**  
Walnut Creek, California  
(June 12, 2023)  
FINRA Case #2022075483101

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**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.)

**David Bruce Burch (CRD #1136307)**  
Benson, Arizona  
(June 5, 2023)  
FINRA Case #2022077353701

**Timothy Claypool (CRD #4729794)**  
Amarillo, Texas  
(June 16, 2023)  
FINRA Case #2021073166102

**Ebony Imani Parks (CRD #6841447)**  
Davenport, Iowa  
(June 20, 2023)  
FINRA Case #2021073074202

**Rashawn Ronandi Russell (CRD #6982850)**  
Brooklyn, New York  
(June 1, 2023)  
FINRA Case #2022077128101

**Daniel Abraham Santos (CRD #6427171)**  
West Reading, Pennsylvania  
(June 15, 2023)  
FINRA Case #2022073951301

**Michael Gary Solomon (CRD #2024161)**  
Highland Beach, Florida  
(June 23, 2023)  
FINRA Case #2021072686401

**Bertram Brasher Unger (CRD #2334575)**  
 Jupiter, Florida  
 (June 26, 2023)  
 FINRA Case #2022076343201

**Frank Corey Weiss (CRD #5375676)**  
 Liverpool, New York  
 (June 20, 2023)  
 FINRA Case #2023078591901/  
 ARB230010/Arbitration Case #22-01649

**Shane Collins Wilhelm (CRD #4803933)**  
 Moneta, Virginia  
 (June 26, 2023)  
 FINRA Case #2021072674801

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**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.)

**Dennis Phillip Ayre (CRD #5365176)**  
 Van Nuys, California  
 (June 12, 2023)  
 FINRA Arbitration Case #23-00602

**Bruce Lavar Davis (CRD #5602776)**  
 Rancho Cordova, California  
 (June 12, 2023)  
 FINRA Arbitration Case #22-00467

**Gail Antoinette Milon (CRD #1766745)**  
 Tallahassee, Florida  
 (June 5, 2023 – July 21, 2023)  
 FINRA Arbitration Case #22-01266

**Trevor Michael Perry (CRD #4994149)**  
 Boca Raton, Florida  
 (June 6, 2023 – June 21, 2023)  
 FINRA Case #2023077559901/  
 ARB230003/Arbitration Case #20-02447