

BrokerCheck Report

RICHARDS MERRILL WEALTH MANAGEMENT

CRD# 713

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.

About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

- **What is included in a BrokerCheck report?**

- BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

- Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

- **Where did this information come from?**

- The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:
 - information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
 - information that regulators report regarding disciplinary actions or allegations against firms or brokers.

- **How current is this information?**

- Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

- **What if I want to check the background of an investment adviser firm or investment adviser representative?**

- To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

- **Are there other resources I can use to check the background of investment professionals?**

- FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

• **Thank you for using FINRA BrokerCheck.**



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at brokercheck.finra.org



For additional information about the contents of this report, please refer to the User Guidance or www.finra.org/brokercheck. It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit www.finra.org.



RICHARDS MERRILL WEALTH MANAGEMENT

CRD# 713

SEC# 8-71

Main Office Location

612 WEST MAIN STREET
THE M BUILDING SUITE 201
SPOKANE, WA 99201
Regulated by FINRA Denver Office

Mailing Address

612 WEST MAIN STREET
THE M BUILDING SUITE 201
SPOKANE, WA 99201

Business Telephone Number

(509) 624-3174

This firm is a brokerage firm and an investment adviser firm. For more information about investment adviser firms, visit the SEC's Investment Adviser Public Disclosure website at:

<https://www.adviserinfo.sec.gov>

Report Summary for this Firm

This report summary provides an overview of the brokerage firm. Additional information for this firm can be found in the detailed report.

Firm Profile

This firm is classified as a corporation.

This firm was formed in Washington on 07/27/1923.

Its fiscal year ends in December.

Firm History

Information relating to the brokerage firm's history such as other business names and successions (e.g., mergers, acquisitions) can be found in the detailed report.

Firm Operations

This firm is registered with:

- the SEC
- 1 Self-Regulatory Organization
- 29 U.S. states and territories

Is this brokerage firm currently suspended with any regulator? **No**

This firm conducts 9 types of businesses.

This firm is not affiliated with any financial or investment institutions.

This firm does not have referral or financial arrangements with other brokers or dealers.

Disclosure Events

Brokerage firms are required to disclose certain criminal matters, regulatory actions, civil judicial proceedings and financial matters in which the firm or one of its control affiliates has been involved.

Are there events disclosed about this firm? **Yes**

The following types of disclosures have been reported:

Type	Count
Regulatory Event	6



Firm Profile

This firm is classified as a corporation.

This firm was formed in Washington on 07/27/1923.

Its fiscal year ends in December.

Firm Names and Locations

This section provides the brokerage firm's full legal name, "Doing Business As" name, business and mailing addresses, telephone number, and any alternate name by which the firm conducts business and where such name is used.

RICHARDS, MERRILL & PETERSON, INC.

Doing business as RICHARDS MERRILL WEALTH MANAGEMENT

CRD# 713

SEC# 8-71

Main Office Location

612 WEST MAIN STREET
THE M BUILDING SUITE 201
SPOKANE, WA 99201

Regulated by FINRA Denver Office

Mailing Address

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THE M BUILDING SUITE 201
SPOKANE, WA 99201

Business Telephone Number

(509) 624-3174



Firm Profile

This section provides information relating to all direct owners and executive officers of the brokerage firm.

Direct Owners and Executive Officers

Legal Name & CRD# (if any):	LARSON, JOHN SCOTT 1368801
Is this a domestic or foreign entity or an individual?	Individual
Position	CEO CHAIRMAN OF THE BOARD COO & CO-CCO
Position Start Date	07/2025
Percentage of Ownership	25% but less than 50%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	CALKINS, MARK J 6369006
Is this a domestic or foreign entity or an individual?	Individual
Position	PRESIDENT
Position Start Date	07/2025
Percentage of Ownership	10% but less than 25%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	LARSON, STEVEN RICHARD 1029292
Is this a domestic or foreign entity or an individual?	Individual
Position	CHAIRMAN EMERITUS



Firm Profile

Direct Owners and Executive Officers (continued)

Position Start Date	07/2025
Percentage of Ownership	10% but less than 25%
Does this owner direct the management or policies of the firm?	Yes
Is this a public reporting company?	No

Legal Name & CRD# (if any):	MCDONALD, THOMAS LEE 1195608
Is this a domestic or foreign entity or an individual?	Individual
Position	EXECUTIVE VICE PRESIDENT CFO & BD CO-CCO
Position Start Date	07/2025
Percentage of Ownership	10% but less than 25%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Legal Name & CRD# (if any):	CORIGLIANO, MONIQUE CELESTE 1497927
Is this a domestic or foreign entity or an individual?	Individual
Position	REGISTERED REPRESENTATIVE
Position Start Date	03/2011
Percentage of Ownership	Less than 5%
Does this owner direct the management or policies of the firm?	No
Is this a public reporting company?	No

Firm Profile

This section provides information relating to any indirect owners of the brokerage firm.

Indirect Owners

No information reported.



Firm History

This section provides information relating to any successions (e.g., mergers, acquisitions) involving the firm.

No information reported.





Firm Operations

Registrations

This section provides information about the regulators (Securities and Exchange Commission (SEC), self-regulatory organizations (SROs), and U.S. states and territories) with which the brokerage firm is currently registered and licensed, the date the license became effective, and certain information about the firm's SEC registration.

This firm is currently registered with the SEC, 1 SRO and 29 U.S. states and territories.

Federal Regulator	Status	Date Effective
SEC	Approved	01/01/1936

SEC Registration Questions

This firm is registered with the SEC as:

A broker-dealer: Yes

A broker-dealer and government securities broker or dealer: Yes

A government securities broker or dealer only: No

This firm has ceased activity as a government securities broker or dealer: No

Self-Regulatory Organization	Status	Date Effective
FINRA	Approved	10/16/1936



Firm Operations

Registrations (continued)

U.S. States & Territories	Status	Date Effective
Alaska	Approved	01/12/2024
Arizona	Approved	11/20/2003
California	Approved	06/04/1990
Colorado	Approved	01/12/2015
Connecticut	Approved	03/03/2015
District of Columbia	Approved	07/23/2024
Florida	Approved	01/28/2015
Hawaii	Approved	01/30/2015
Idaho	Approved	01/01/1969
Illinois	Approved	01/30/2015
Iowa	Approved	01/06/2015
Kansas	Approved	02/05/2015
Maryland	Approved	01/30/2015
Minnesota	Approved	06/21/2024
Missouri	Approved	02/05/2015
Montana	Approved	01/26/2015
Nebraska	Approved	06/19/2015
Nevada	Approved	02/26/2015
New Hampshire	Approved	09/27/2024
New Mexico	Approved	06/08/2017
New York	Approved	01/12/2015
North Carolina	Approved	06/17/2024
Oregon	Approved	03/10/2016
Pennsylvania	Approved	07/18/2024
South Carolina	Approved	07/14/2016
Texas	Approved	09/14/2016
Utah	Approved	04/08/2019
Virginia	Approved	01/27/2015
Washington	Approved	04/20/1983



Firm Operations

Types of Business

This section provides the types of business, including non-securities business, the brokerage firm is engaged in or expects to be engaged in.

This firm currently conducts 9 types of businesses.

Types of Business

Broker or dealer retailing corporate equity securities over-the-counter
Broker or dealer selling corporate debt securities
Mutual fund retailer
U S. government securities dealer
U S. government securities broker
Municipal securities dealer
Municipal securities broker
Broker or dealer selling variable life insurance or annuities
Investment advisory services

Firm Operations



Clearing Arrangements

This firm does not hold or maintain funds or securities or provide clearing services for other broker-dealer(s).

Introducing Arrangements

This firm does not refer or introduce customers to other brokers and dealers.

Firm Operations

Industry Arrangements



This firm does have books or records maintained by a third party.

Name:	WELLS FARGO CLEARING SERVICES, LLC
CRD #:	19616
Business Address:	ONE NORTH JEFFERSON ST LOUIS, MO 63013
Effective Date:	11/11/2016
Description:	TO REFLECT NAME CHANGE OF FIRST CLEARING TO WELLS FARGO CLEARING SERVICES INC. FULLY DISCLOSED CLEARING AGREEMENT IN PLACE SINCE 2013.

This firm does not have accounts, funds, or securities maintained by a third party.

This firm does not have customer accounts, funds, or securities maintained by a third party.

Control Persons/Financing

This firm does not have individuals who control its management or policies through agreement.

This firm does not have individuals who wholly or partly finance the firm's business.



Firm Operations

Organization Affiliates

This section provides information on control relationships the firm has with other firms in the securities, investment advisory, or banking business.

This firm is not, directly or indirectly:

- in control of
 - controlled by
 - or under common control with
- the following partnerships, corporations, or other organizations engaged in the securities or investment advisory business.**

This firm is not directly or indirectly, controlled by the following:

- bank holding company
- national bank
- state member bank of the Federal Reserve System
- state non-member bank
- savings bank or association
- credit union
- or foreign bank



Disclosure Events

All firms registered to sell securities or provide investment advice are required to disclose regulatory actions, criminal or civil judicial proceedings, and certain financial matters in which the firm or one of its control affiliates has been involved. For your convenience, below is a matrix of the number and status of disclosure events involving this brokerage firm or one of its control affiliates. Further information regarding these events can be found in the subsequent pages of this report.

	Pending	Final	On Appeal
Regulatory Event	0	6	0



Disclosure Event Details

What you should know about reported disclosure events:

1. **BrokerCheck provides details for any disclosure event that was reported in CRD. It also includes summary information regarding FINRA arbitration awards in cases where the brokerage firm was named as a respondent.**
2. **Certain thresholds must be met before an event is reported to CRD, for example:**
 - A law enforcement agency must file formal charges before a brokerage firm is required to disclose a particular criminal event.
3. **Disclosure events in BrokerCheck reports come from different sources:**
 - Disclosure events for this brokerage firm were reported by the firm and/or regulators. When the firm and a regulator report information for the same event, both versions of the event will appear in the BrokerCheck report. The different versions will be separated by a solid line with the reporting source labeled.
4. **There are different statuses and dispositions for disclosure events:**
 - A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" event involves allegations that have not been proven or formally adjudicated.
 - An event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" event has been concluded and its resolution is not subject to change.
 - A final event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally involves an agreement by the parties to resolve the matter. Please note that firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually involves no payment to the customer and no finding of wrongdoing on the part of the individual broker. Such matters generally involve customer disputes.
5. **You may wish to contact the brokerage firm to obtain further information regarding any of the disclosure events contained in this BrokerCheck report.**

Regulatory - Final

This type of disclosure event involves (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulator such as the U.S. Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of the authority of a brokerage firm or its control affiliate to act as an attorney, accountant or federal contractor.

Disclosure 1 of 6

Reporting Source: Regulator

Current Status: Final



Allegations: BEGINNING IN 1997 THROUGH SEPTEMBER 2016, RICHARDS, MERRILL & PETERSEN, INC. SOLD SECURITIES IN TEXAS WITHOUT BEING REGISTERED AS A DEALER WITH THE SECURITIES COMMISSIONER OF TEXAS. ACCORDINGLY, THE FIRM VIOLATED SECTION 12.A OF THE TEXAS SECURITIES ACT. TO RESOLVE THESE VIOLATIONS OF THE TEXAS SECURITIES ACT, THE FIRM AGREED TO A DISCIPLINARY ORDER AND PAID AN ADMINISTRATIVE FINE OF \$30,000.

Initiated By: TEXAS

Date Initiated: 05/02/2016

Docket/Case Number: REG16-CAF-15

URL for Regulatory Action: [HTTPS://WWW.SSB.TEXAS.GOV/SITES/DEFAULT/FILES/FILES/NEWS/ORDER%20NO.%20REG16-CAF-15.PDF](https://www.ssb.texas.gov/sites/default/files/files/news/order%20no.%20reg16-CAF-15.pdf)

Principal Product Type: Mutual Fund(s)

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought:

Resolution: Order

Resolution Date: 09/14/2016

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct? No

Sanctions Ordered: Monetary/Fine \$30,000.00

Other Sanctions Ordered:

Sanction Details: \$30,000 PAID CONTEMPORANEOUSLY WITH ENTRY OF THE ORDER.

Reporting Source: Firm

Current Status: Final

Allegations: TRANSACTING BUSINESS IN TEXAS AS A BROKER-DEALER WITHOUT AN TEXAS LICENSE; EMPLOYING SALESPERSONS TO ACT IN TEXAS WITHOUT



AN TEXAS LICENSE.

Initiated By: TEXAS STATE SECURITIES BOARD**Date Initiated:** 09/14/2016**Docket/Case Number:** REG16-CAF-15**Principal Product Type:** No Product**Other Product Type(s):****Principal Sanction(s)/Relief Sought:** Reprimand**Other Sanction(s)/Relief Sought:****Resolution:** Consent**Resolution Date:** 09/14/2016**Sanctions Ordered:** Monetary/Fine \$30,000.00**Other Sanctions Ordered:****Sanction Details:** ASSESSED AN ADMINISTRATIVE FINE OF \$30,000 PAID IN FULL 9/13/2016.**Firm Statement** REPRIMAND AND CENSOR ALONG WITH ADMINISTRATION FINE OF \$30000 PAID IN FULL 9/13/16**Reporting Source:** Firm**Current Status:** Final**Allegations:** TRANSACTING BUSINESS IN TEXAS AS A BROKER-DEALER WITHOUT AN TEXAS LICENSE; EMPLOYING SALESPERSONS TO ACT IN TEXAS WITHOUT AN TEXAS LICENSE.**Initiated By:** TEXAS STATE SECURITIES BOARD**Date Initiated:** 09/14/2016**Docket/Case Number:** REG16-CAF-15**Principal Product Type:** No Product**Other Product Type(s):****Principal Sanction(s)/Relief Sought:** Reprimand


Other Sanction(s)/Relief Sought:

Resolution: Consent
Resolution Date: 09/14/2016
Sanctions Ordered: Monetary/Fine \$30,000.00
Other Sanctions Ordered:
Sanction Details: ASSESSED AN ADMINISTRATIVE FINE OF \$30,000 PAID IN FULL 9/13/2016.
Firm Statement REPRIMAND AND CENSOR ALONG WITH ADMINISTRATION FINE OF \$30000 PAID IN FULL 9/13/16

Disclosure 2 of 6

Reporting Source: Regulator
Current Status: Final
Allegations: WITHOUT ADMITTING OR DENYING THE FINDINGS, THE FIRM CONSENTED TO THE SANCTIONS AND TO THE ENTRY OF FINDINGS THAT IT SOLD A MUNICIPAL BOND TO CUSTOMERS IN MULTIPLE TRANSACTIONS IN AMOUNTS BELOW THE BOND'S MINIMUM DENOMINATION.
Initiated By: FINRA
Date Initiated: 04/11/2016
Docket/Case Number: [2015043333801](#)
Principal Product Type: Debt - Municipal
Other Product Type(s):
Principal Sanction(s)/Relief Sought:
Other Sanction(s)/Relief Sought:
Resolution: Acceptance, Waiver & Consent(AWC)
Resolution Date: 04/11/2016



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Censure Monetary/Fine \$45,000.00
Other Sanctions Ordered:	
Sanction Details:	THE FIRM WAS CENSURED AND FINED \$45,000. FINE PAID IN FULL ON MAY 2, 2016.
<hr/>	
Reporting Source:	Firm
Current Status:	Final
Allegations:	FIRM SOLD A MUNICIPAL BOND TO CUSTOMERS IN MULTIPLE TRANSACTIONS IN AMOUNTS BELOW THE BOND'S MINIMUM DENOMINATION. AS A RESULT THE FIRM VIOLATED MSRB RULES G-15(F) AND G-17
Initiated By:	FINRA
Date Initiated:	04/11/2016
Docket/Case Number:	2015043333801
Principal Product Type:	Debt - Municipal
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Censure
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	04/11/2016
Sanctions Ordered:	Censure Monetary/Fine \$45,000.00
Other Sanctions Ordered:	
Sanction Details:	FINE AMOUNT OF \$45,000 AGAINST FIRM WHICH WILL BE PAID DURING THE MONTH OF APRIL 2016.



Firm Statement AWC ACCEPTED AND FINE WILL BE PAID IN FULL IN APRIL 2016.

Disclosure 3 of 6

Reporting Source:	Regulator
Current Status:	Final
Allegations:	TRANSACTIONING BUSINESS IN OREGON AS A BROKER-DEALER WITHOUT AN OREGON LICENSE; EMPLOYING A SALESPERSON TO ACT IN OREGON WITHOUT AN OREGON LICENSE
Initiated By:	OREGON DEPARTMENT OF CONSUMER AND BUSINESS SERVICES, DIVISION OF FINANCIAL REGULATION
Date Initiated:	03/10/2016
Docket/Case Number:	S-16-0105
URL for Regulatory Action:	
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Cease and Desist
Other Sanction(s)/Relief Sought:	CIVIL PENALTY AND INVESTIGATION COSTS
Resolution:	Consent
Resolution Date:	03/10/2016
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	Monetary/Fine \$12,500.00
Other Sanctions Ordered:	FINE \$12,500 AND INVESTIGATION COSTS \$2,500
Sanction Details:	CIVIL PENALTY OF \$12,500 AND INVESTIGATION COSTS OF \$2,500 PAID IN FULL ON 3/9/16.
Regulator Statement	REFERRAL FROM SECURITIES EXAMINER REGARDING VIOLATIONS OF ORS 59.165(1) AND ORS 59.165(3). THIS MATTER RESOLVED BY CONSENT ORDER EXECUTED ON 3/10/16



Reporting Source:	Firm
Current Status:	Final
Allegations:	TRANSACTIONING BUSINESS IN OREGON AS A BROKER-DEALER WITHOUT AN OREGON LICENSE; EMPLOYING A SALESPERSON TO ACT IN OREGON WITHOUT AN OREGON LICENSE
Initiated By:	OREGON DEPARTMENT OF CONSUMER AND BUSINESS SERVICES
Date Initiated:	03/10/2016
Docket/Case Number:	S-16-0105
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other
Other Sanction(s)/Relief Sought:	CIVIL PENALTY AND INVESTIGATION COSTS
Resolution:	Consent
Resolution Date:	03/10/2016
Sanctions Ordered:	Monetary/Fine \$12,500.00
Other Sanctions Ordered:	FINE \$12,500 AND INVESTIGATION COSTS OF \$2,500
Sanction Details:	CIVIL PENALTY OF \$12,500 AND INVESTIGATION COSTS OF \$2,500 PAID IN FULL ON 3/9/16.
Firm Statement	REFERRAL FROM SECURITIES EXAMINER REGARDING VIOLATIONS OF ORS 59.165(1) AND ORS 59.165(3). THIS MATTER RESOLVED BY CONSENT ORDER EXECUTED ON 3/10/16.

Disclosure 4 of 6

Reporting Source:	Regulator
Current Status:	Final
Allegations:	UNREGISTERED ACTIVITY PROVIDING A FALSE AFFIDAVIT TO THE DIRECTOR
Initiated By:	NEBRASKA DEPARTMENT OF BANKING AND FINANCE
Date Initiated:	06/19/2015

**Docket/Case Number:****URL for Regulatory Action:** HTTP://WWW.NDBF.NE.GOV/SEARCHES/ORDERS.PHP**Principal Product Type:** No Product**Other Product Type(s):****Principal Sanction(s)/Relief Sought:** Civil and Administrative Penalt(ies) /Fine(s)

Other Sanction(s)/Relief Sought: CONSENT ORDER:
 \$5000 PROVIDING FALSE AND MISLEADING INFORMATION TO THE DIRECTOR.
 \$1000 COST OF INVESTIGATION
 \$2500 UNREGISTERED BROKER-DEALER

Resolution: Consent**Resolution Date:** 06/19/2015

Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

No

Sanctions Ordered: Monetary/Fine \$8,500.00**Other Sanctions Ordered:****Sanction Details:**

1.WITHIN TEN DAYS AFTER THE EFFECTIVE DATE OF THIS CONSENT ORDER, RMP SHALL PAY A FINE OF TWO THOUSAND FIVE HUNDRED DOLLARS (\$2,500.00) FOR ITS VIOLATIONS OF NEB. REV. STAT. § 8-1103(1) BY ACTING AS A BROKER-DEALER WITHOUT REGISTERING WITH THE DEPARTMENT.

2.WITHIN TEN DAYS AFTER THE EFFECTIVE DATE OF THIS CONSENT ORDER, RMP SHALL PAY A FINE OF FIVE THOUSAND HUNDRED DOLLARS (\$5,000.00) FOR ITS VIOLATION OF NEB. REV. STAT. § 8-1113 BY PROVIDING FALSE AND MISLEADING INFORMATION TO THE DEPARTMENT.

3.WITHIN TEN DAYS AFTER THE EFFECTIVE DATE OF THIS CONSENT ORDER, RMP SHALL PAY THE INVESTIGATION COSTS OF THE DEPARTMENT IN THE AMOUNT OF ONE THOUSAND DOLLARS (\$1,000.00).

4.THE TOTAL AMOUNT OF THE FINE AND INVESTIGATION COSTS, EIGHT THOUSAND FIVE HUNDRED DOLLARS (\$8,500.00) SHALL BE PAID BY ONE CHECK PAYABLE TO THE DEPARTMENT WITHIN TEN DAYS AFTER THE EFFECTIVE DATE OF THIS CONSENT ORDER.

FINE PAID IN FULL 06/19/2015
 FIRM APPROVED 06/19/2015



Regulator Statement

RICHARDS, MERRILL & PETERSON ("RMP") RMP IS A CORPORATION ORGANIZED PURSUANT TO THE LAWS OF WASHINGTON. AT ALL TIMES RELEVANT HERETO, RMP WAS NOT REGISTERED AS A BROKER-DEALER IN NEBRASKA.

ON JANUARY 5, 2014, RMP FILED AN APPLICATION FOR REGISTRATION AS A BROKER-DEALER IN NEBRASKA THROUGH THE CENTRAL REGISTRATION DEPOSITORY ("CRD").

AS PART OF ITS APPLICATION, RMP SUBMITTED TO THE DEPARTMENT AN "AFFIDAVIT OF BROKER DEALER ACTIVITY IN NEBRASKA" IN WHICH IT ATTESTED THAT IT HAD NOT CONDUCTED BROKER-DEALER ACTIVITY IN NEBRASKA.

AS PART OF ITS REVIEW OF THE APPLICATION, THE DEPARTMENT CONTACTED FIRST CLEARING, LLC ("FIRST CLEARING"), RMP'S CLEARING BROKER. ACCORDING TO INFORMATION SUPPLIED BY FIRST CLEARING, RMP HAD ACCOUNTS FOR FOUR NEBRASKA RESIDENTS. RMP CONDUCTED THIRTY-ONE TRADES BETWEEN 2003 AND 2013 AND EIGHT TRADES IN 2014 FOR THESE NEBRASKA RESIDENTS.

AFTER LEARNING OF THE TRADES FROM FIRST CLEARING, THE DEPARTMENT CONTACTED RMP. RMP CONFIRMED THAT THE TRADES HAD OCCURRED. RMP REPRESENTED THAT THREE OF THE ACCOUNTS WERE OPENED WHEN THE INDIVIDUALS WERE RESIDENTS OF WASHINGTON, AND THAT THOSE INDIVIDUALS HAD SUBSEQUENTLY MOVED TO NEBRASKA. THESE ACCOUNTS WERE TRANSFERRED FROM RMP IN 2013. THE OTHER ACCOUNT WAS OPENED AS A RESULT OF AN INHERITANCE AND IS ACTIVE AS OF THE DATE OF THIS ORDER.

Reporting Source:	Firm
Current Status:	Final
Allegations:	CONDUCTING SECURITIES TRANSACTIONS AND PROVIDING A FALSE AFFIDAVIT STATING WE HAD NOT ENGAGED IN BUSINESS IN THE STATE OF NEBRASKA.
Initiated By:	NEBRASKA DEPARTMENT OF BANKING & FINANCE
Date Initiated:	06/19/2015
Docket/Case Number:	URL FOR REGULATORY ACTION: HTTP://NDBF.NE.GOV//SEARCHES/ORDER.PHP
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Other



Other Sanction(s)/Relief Sought:	CONSENT ORDER AND FINES OF \$8,500 (\$5000 FOR PROVIDING FALSE AND MISLEADING INFORMATION IN OUR APPLICATION FOR REGISTRATION WITH THE STATE OF NEBRASKA; \$1000 COST OF INVESTIGATION AND \$2500 FINE FOR CONDUCTING BUSINESS IN NEBRASKA WHEN NOT REGISTERED).
Resolution:	Consent
Resolution Date:	06/19/2015
Sanctions Ordered:	Monetary/Fine \$8,500.00
Other Sanctions Ordered:	
Sanction Details:	RMP PAID A FINE OF \$8,500 FOR VIOLATION OF STATE OF NEBRASKA'S RULES GOVERNING BROKER-DEALER REGISTRATION.
Firm Statement	RMP DID NOT SOLICIT BUSINESS IN THE STATE OF NEBRASKA PRIOR TO REGISTRATION. THREE (3) ACCOUNTS WERE RESIDENTS OF WA WHEN THE ACCOUNTS WERE OPENED AND SUBSEQUENTLY MOVED TO NEBRASKA. ANOTHER ACCOUNT WAS OPENED AS A RESULT OF AN INHERITANCE FROM A RESIDENT OF WASHINGTON.

Disclosure 5 of 6

Reporting Source:	Regulator
Current Status:	Final
Allegations:	MSRB RULE G-37 - RESPONDENT MEMBER FAILED TO TIMELY SUBMIT FORM G-37 TO THE MSRB.
Initiated By:	NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
Date Initiated:	06/19/1997
Docket/Case Number:	C3B960024
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	Civil and Administrative Penalt(ies) /Fine(s)
Other Sanction(s)/Relief Sought:	
Resolution:	Acceptance, Waiver & Consent(AWC)
Resolution Date:	06/19/1997



Sanctions Ordered: Censure
Monetary/Fine \$500.00

Other Sanctions Ordered:

Sanction Details: WITHOUT ADMITTING OR DENYING THE ALLEGATIONS, RICHARDS, MERRILL AND PETERSON, INC. CONSENTED TO THE DESCRIBED SANCTIONS AND TO THE ENTRY OF FINDINGS, THEREFORE THE FIRM IS CENSURED AND FINED \$500.00

Reporting Source: Firm

Current Status: Final

Allegations: MSRB RULE G-37 FAILER TO TIMELY SUBMIT FORM G-37 TO THE MSRB

Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS

Date Initiated: 06/19/1997

Docket/Case Number: C3B960024

Principal Product Type: Debt - Municipal

Other Product Type(s):

Principal Sanction(s)/Relief Sought: Censure

Other Sanction(s)/Relief Sought:

Resolution: Acceptance, Waiver & Consent(AWC)

Resolution Date: 07/17/1997

Sanctions Ordered: Censure
Monetary/Fine \$500.00

Other Sanctions Ordered: NONE

Sanction Details: \$500 PAID INVOICE #97-3B-570 ON 7/17/97

Firm Statement FIRM INTERPRETATION OF THE G-37 RULE WAS TO SUBMIT FILING IF IN FACT FIRM HAD PARTICIPATED IN UNDERWRITINGS AND POLITICAL CONTRIBUTIONS WERE MADE.

Disclosure 6 of 6

Reporting Source: Regulator



Current Status:	Final
Allegations:	N/A
Initiated By:	NASD
Date Initiated:	08/26/1977
Docket/Case Number:	N-VS-287
Principal Product Type:	No Product
Other Product Type(s):	
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	08/26/1977
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	No
Sanctions Ordered:	
Other Sanctions Ordered:	
Sanction Details:	N/A
Regulator Statement	NASDAQ COMPLAINT N-VS-287 FILED 8-26-77

Reporting Source:	Firm
Current Status:	Final
Allegations:	NOT AVAIABLE DUE THE AGE OF THIS ACTION
Initiated By:	NASD
Date Initiated:	08/26/1977
Docket/Case Number:	N-VS-287
Principal Product Type:	Other



Other Product Type(s):	EQUITES, BONDS AND MUTUAL FUNDS
Principal Sanction(s)/Relief Sought:	
Other Sanction(s)/Relief Sought:	
Resolution:	Other
Resolution Date:	08/26/1977
Sanctions Ordered:	
Other Sanctions Ordered:	
Sanction Details:	SANCTION DETAIL NOT AVAILABLE DUE TO THE AGE OF ITEM
Firm Statement	SANCTION DETAIL NOT AVAILABLE DUE TO THE AGE OF ITEM WE HAVE TRIED TO GET THIS RESOLVED FOR YEARS BUT NASD IS NOT ABLE TO PROVIDE DETAIL OF THE ISSUE.

End of Report



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