

BrokerCheck Report

WILLIAM WALTER WELSH

CRD# 1602929

Section Title	Page(s)
Report Summary	1
Broker Qualifications	2 - 5
Registration and Employment History	7
Disclosure Events	8



When communicating online or investing with any professional, make sure you know who you're dealing with. <u>Imposters</u> might link to sites like BrokerCheck from <u>phishing</u> or similar scam websites, or through <u>social media</u>, 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:
 - o 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
 - o 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.

www.finra.org/brokercheck
User Guidance

WILLIAM W. WELSH

CRD# 1602929

Currently employed by and registered with the following Firm(s):

B ROOSEVELT & CROSS, INCORPORATED

ONE EXCHANGE PLAZA 55 BROADWAY, 22ND FL NEW YORK, NY 10006 CRD# 6964

Registered with this firm since: 04/29/1987

Report Summary for this Broker



This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

Broker Qualifications

This broker is registered with:

- 1 Self-Regulatory Organization
- 42 U.S. states and territories

This broker has passed:

- 1 Principal/Supervisory Exam
- 3 General Industry/Product Exams
- 1 State Securities Law Exam

Registration History

This broker was previously registered with the following securities firm(s):

No information reported.

Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

Are there events disclosed about this broker? Yes

The following types of disclosures have been reported:

Type Count Regulatory Event 2



Date

Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

Status

This individual is currently registered with 1 SRO and is licensed in 42 U.S. states and territories through his or her employer.

Employment 1 of 1

Firm Name: ROOSEVELT & CROSS, INCORPORATED

Main Office Address: 55 BROADWAY, 22ND FL

NEW YORK, NY 10006

Category

Firm CRD#: **6964**

SRO

	SKU	Category	Status	Date
B	FINRA	General Securities Representative	Approved	04/29/1987
B	FINRA	Municipal Securities Principal	Approved	08/03/2010
B	FINRA	Municipal Securities Representative	Approved	03/14/2021
	U.S. State/ Territory	Category	Status	Date
B	Alabama	Agent	Approved	05/25/2021
B	Arizona	Agent	Approved	04/04/2008
B	Arkansas	Agent	Approved	04/06/2017
B	California	Agent	Approved	04/08/2021
B	Colorado	Agent	Approved	04/03/2012
В	Connecticut	Agent	Approved	04/29/1987
B	Delaware	Agent	Approved	04/06/2017
B	District of Columbia	Agent	Approved	04/06/2017
B	Florida	Agent	Approved	05/07/1987
В	Georgia	Agent	Approved	04/06/2017



Employment 1 of 1, continued

	U.S. State/ Territory	Category	Status	Date
B	Idaho	Agent	Approved	04/06/2017
В	Illinois	Agent	Approved	04/06/2017
B	Indiana	Agent	Approved	04/06/2017
B	lowa	Agent	Approved	04/06/2017
B	Kansas	Agent	Approved	04/06/2017
B	Kentucky	Agent	Approved	04/06/2017
B	Louisiana	Agent	Approved	04/06/2017
B	Maine	Agent	Approved	05/20/2021
B	Michigan	Agent	Approved	04/20/2021
B	Minnesota	Agent	Approved	10/06/2009
B	Mississippi	Agent	Approved	04/06/2017
B	Missouri	Agent	Approved	04/06/2017
B	Montana	Agent	Approved	04/06/2017
B	Nebraska	Agent	Approved	04/06/2017
B	Nevada	Agent	Approved	04/06/2017
B	New Hampshire	Agent	Approved	04/09/1990
B	New Jersey	Agent	Approved	04/12/1991
B	New Mexico	Agent	Approved	01/25/2018
В	New York	Agent	Approved	05/27/1987
B	North Carolina	Agent	Approved	04/10/2017
B	North Dakota	Agent	Approved	04/06/2017



Employment 1 of 1, continued

	U.S. State/ Territory	Category	Status	Date
B	Oregon	Agent	Approved	04/06/2017
B	Pennsylvania	Agent	Approved	04/06/2017
B	Puerto Rico	Agent	Approved	04/06/2017
B	Rhode Island	Agent	Approved	06/02/1987
B	South Carolina	Agent	Approved	03/21/2017
B	South Dakota	Agent	Approved	04/06/2017
B	Texas	Agent	Approved	04/06/2017
B	Virginia	Agent	Approved	04/06/2017
B	West Virginia	Agent	Approved	04/06/2017
B	Wisconsin	Agent	Approved	04/06/2017
B	Wyoming	Agent	Approved	04/06/2017

Branch Office Locations

ROOSEVELT & CROSS, INCORPORATED

ONE EXCHANGE PLAZÁ 55 BROADWAY, 22ND FL NEW YORK, NY 10006

ROOSEVELT & CROSS, INCORPORATED

Jupiter, FL



Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below. A passed exam or exam waiver does not permit a broker to do business without an active SRO or state registration.

This individual has passed 1 principal/supervisory exam, 3 general industry/product exams, and 1 state securities law exam.

Principal/Supervisory Exams

Exan	1	Category	Date
В	Municipal Securities Principal Examination	Series 53	08/02/2010

General Industry/Product Exams

Exam		Category	Date
В	Municipal Securities Representative Examination	Series 52TO	09/25/2025
В	Securities Industry Essentials Examination	SIE	10/01/2018
В	General Securities Representative Examination	Series 7	04/25/1987

State Securities Law Exams

Exam		Category	Date
В	Uniform Securities Agent State Law Examination	Series 63	05/26/1987

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at www.finra.org/brokerqualifications/registeredrep/.

www.finra.org/brokercheck
User Guidance

Broker Qualifications



Professional Designations

This section details that the representative has reported **0** professional designation(s).

No information reported.

www.finra.org/brokercheck

Registration and Employment History



Registration History

The broker previously was registered with the following firms:

Registration Dates Firm Name CRD# Branch Location

No information reported.

Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.

Employment	Employer Name	Position	Investment Related	Employer Location
11/1986 - Present	ROOSEVELT & CROSS, INCORPORATED	NOT PROVIDED	Υ	NEW YORK, NY, United States

Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious or fraternal and is recognized as tax exempt.

No information reported.

Disclosure Events



What you should know about reported disclosure events:

1. All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

2. Certain thresholds must be met before an event is reported to CRD, for example:

- o A law enforcement agency must file formal charges before a broker is required to disclose a particular criminal event.
- A customer dispute must involve allegations that a broker engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

3. Disclosure events in BrokerCheck reports come from different sources:

 As mentioned at the beginning of this report, information contained in BrokerCheck comes from brokers, brokerage firms and regulators. When more than one of these sources reports information for the same disclosure event, all 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:

- o 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.
- o 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 brokers and brokerage 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.

For your convenience, below is a matrix of the number and status of disclosure events involving this broker. Further information regarding these events can be found in the subsequent pages of this report. You also may wish to contact the broker to obtain further information regarding these events.

	Pending	Final	On Appeal
Regulatory Event	0	2	0

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Disclosure Event Details

When evaluating this information, please keep in mind that a discloure event may be pending or involve allegations that are contested and have not been resolved or proven. The matter may, in the end, be withdrawn, dismissed, resolved in favor of the broker, or concluded through a negotiated settlement for certain business reasons (e.g., to maintain customer relationships or to limit the litigation costs associated with disputing the allegations) with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to CRD and therefore some of the specific data fields contained in the report may be blank if the information was not provided to CRD.

Regulatory - Final

This type of disclosure event may involve (1) a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, self-regulatory organization, federal regulatory such as the Securities and Exchange Commission, foreign financial regulatory body) for a violation of investment-related rules or regulations; or (2) a revocation or suspension of a broker's authority to act as an attorney, accountant, or federal contractor.

Disclosure 1 of 2

Reporting Source:

Regulator

Regulatory Action Initiated

Bv:

Maryland

Sanction(s) Sought: Revocation

Date Initiated: 09/24/2020

Docket/Case Number: BD20200374

URL for Regulatory Action:

Employing firm when activity occurred which led to the regulatory action:

Roosevelt & Cross Inc.

Product Type: Other: Bonds

Allegations: Respondent entered into an order with the Securities and Exchange Commission

wherein, without admitting or denying any findings, Respondent consented to a six month suspension from association with any broker, dealer, investment adviser,

municipal securities dealer, municipal advisor, or transfer agent and from

participating in any penny stock offerings and the imposition of a \$25,000 fine for, among other things, violating "Section 17(a)(3) of the Securities Act by placing orders from [two flippers] as eligible retail orders when he knew, or should have known that they were not eligible for retail priority, and by including inaccurate zip codes with most of those orders"; violating MSRB G-17 by circumventing the "priority provisions of certain new issue municipal bond offerings by placing orders



with [two flippers] for [Roosevelt & Cross Incorporated's] inventory, when he knew, or should have known, that they would place customer orders with the underwriter in order to improperly obtain a higher priority for Roosevelt; and causing a violation of Section 15B(c)(1) of the Exchange Act by engaging in the "purchases of bonds through [the two flippers] who received transaction-based compensation from Roosevelt when he "knew, or should have known, that [the two flippers] were not registered with the" Securities and Exchange Commission. Grounds exist under sections 11-412(a)(6) and 11-412(a)(7) of the Maryland Securities Act to revoke Respondent's registration.

Current Status: Final

Resolution: Consent

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

No

Resolution Date: 12/28/2020
Sanctions Ordered: Undertaking

Other: Agreement not to reapply for registration in Maryland as an agent or investment adviser representative for period of six months, retroactive to 9/14/2020. If Respondent reapplies in Maryland as an agent of Roosevelt & Cross Inc., Respondent's application is contingent upon Roosevelt & Cross Incorporated providing the Division with procedures reasonably designed to prevent the violations underlying this Order and the action taken by the SEC, improved Know Your Customer Rule policies and procedures, and a clean compliance review.

Reporting Source: Broker
Regulatory Action Initiated Maryland

By:

Marylana

Revocation

Date Initiated: 09/24/2020

Docket/Case Number: BD20200374

Employing firm when activity occurred which led to the regulatory action:

Sanction(s) Sought:

Roosevelt & Cross Inc.



Product Type: Other: Bonds

Allegations: Respondent entered into an order with the Securities and Exchange Commission

wherein, without admitting or denying any findings, Respondent consented to a six month suspension from association with any broker, dealer, investment advisor,

municipal securities dealer, municipal advisor, or transfer agent and from participating in any penny stock offering and the imposition of a \$25,000 fine for, among other things, violating "Section 17(a)(3) of the Securities Act by placing

among other things, violating "Section 17(a)(3) of the Securities Act by placing orders from [two flippers] as eligible retail orders when he knew, or should have known that they were not eligible for retail priority, and by including inaccurate zip codes with most of those orders"; violating MSRB G-17 by circumventing the

"priority provisions of certain new issue municipal bond offerings by placing orders

with [two flippers] for [Roosevelt & Cross Incorporated's] inventory, when he knew, or should have known, that they would place customer orders with the underwriter in order to improperly obtain a higher priority for Roosevelt; and causing a violation of Section 15B(c)(1) of the Exchange Act by engaging in the "purchases of bonds through [the two flippers] who received transaction-based compensation from Roosevelt when he "knew, or should have known", that [the two flippers] were not registered with the Securities and Exchange Commission. Grounds exist under sections 11-412(a)(6) and 11-412(a)(7) of the Maryland Securities Act to revoke

Respondent's registration.

Current Status: Final

Resolution: Consent

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

No

Resolution Date: 12/28/2020 Sanctions Ordered: Undertaking

Other: Agreement not to reapply for registration in Maryland as an agent or investment advisor representative for a period of six months, retroactive to 9/14/2020. If Respondent reapplies in Maryland as an agent of Roosevelt & Cross Inc., Respondent's application is contingent upon Roosevelt & Cross Incorporated providing the Division with procedures reasonably designed to prevent the

violations underlying this Order and the action taken by the SEC, improved Know Your Customer Rule policies and procedures, and a clean compliance review.

Disclosure 2 of 2



Reporting Source: Regulator

Regulatory Action Initiated Bv:

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Sanction(s) Sought: Cease and Desist

Date Initiated: 09/14/2020

Docket/Case Number: 3-19998

Employing firm when activity occurred which led to the regulatory action:

Roosevelt & Cross, Inc.

Product Type: Debt-Municipal

Allegations: The Securities and Exchange Commission ("Commission") deems it appropriate

and in the public interest that public administrative and cease-and-desist

proceedings be, and hereby are, instituted pursuant to Section 8A of the Securities

Act of 1933 ("Securities Act") and Sections 15(b), 15B(c), and 21C of the Securities Exchange Act of 1934 ("Exchange Act"), and Section 9(b) of the Investment Company Act of 1940 ("Investment Company Act") against William W.

Welsh ("Respondent"). This matter involves negligent conduct by Respondent, a registered representative with Roosevelt & Cross, Inc. ("Roosevelt"), in connection with the purchase and sale of new issue municipal bonds. Respondent violated retail order period priority provisions in certain new issue municipal bond offerings by selling bonds intended for retail customers to two unregistered brokers that were known in the industry as "flippers." The flippers obtained bonds from Roosevelt, and then immediately resold, or "flipped," the bonds to other broker-dealers typically at a profit. Although the flippers did not meet the issuer's eligibility criteria for participation in the retail order periods, Respondent sold bonds to the flippers on a retail basis. In addition, Respondent obtained certain new issue municipal bonds for Roosevelt's account by using the two flippers to place customer orders - as opposed to dealer orders - on Roosevelt's behalf with the syndicate in certain primary offerings. These transactions circumvented the priority of orders and gave Roosevelt's orders higher priority in the bond ellegation.

of orders and gave Roosevelt's orders higher priority in the bond allocation process. As a result of his conduct, Welsh willfully violated Section 17(a)(3) of the Securities Act, MSRB Rule G-17, MSRB Rule G-11(k), and caused Violations of

Sections 15(a)(1) and 15B(c)(1) of the Exchange Act.

Current Status: Final

Resolution: Order



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

Yes

Resolution Date:

09/14/2020

Sanctions Ordered:

Cease and Desist

Censure

Civil and Administrative Penalty(ies)/Fine(s)

Prohibition Suspension

Other: Penny Stock Suspension

If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise? Yes

(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?

Yes



(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the **Securities Exchange Act of** 1934, the Investment Advisers Act of 1940, the **Investment Company Act of** 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or

Nο

(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the **Securities Exchange Act of** 1934, the Investment Advisers Act of 1940, the **Investment Company Act of** 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?

Nο

Sanction 1 of 2

Sanction Type: Suspension

Capacities Affected: Participating in any offering of a penny stock

Duration: 6 months

Start Date: 09/14/2020

End Date: 03/13/2021

Sanction 2 of 2



Sanction Type: Suspension

Capacities Affected: broker, dealer, investment adviser, municipal securities dealer, municipal advisor,

transfer agent, or NRSRO

Duration: 6 months

Start Date: 09/14/2020

End Date: 03/13/2021

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$25,000.00

Portion Levied against

individual:

\$25,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty

waived?

No

Amount Waived:

Respondent has submitted an Offer of Settlement (the "Offer") which the

Commission has determined to accept. As a result of his conduct, Welsh willfully violated Section 17(a)(3) of the Securities Act, MSRB Rule G-17, MSRB Rule G-11(k), and caused Violations of Sections 15(a)(1) and 15B(c)(1) of the Exchange Act. Accordingly, it is hereby ordered that: Welsh is censured and shall cease and desist from committing or causing any violations and any future violations of Section 17(a) of the Securities Act and Sections 15(a)(1) and 15B(c)(1) of the Exchange Act and MSRB Rules G-11 and G-17. Welsh be, and hereby is:

suspended from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization (NRSRO), prohibited from serving or acting as an employee, officer, director, member of an advisory board, investment adviser or depositor of, or principal underwriter for, a registered investment company or affiliated person of such investment adviser, depositor, or principal underwriter, and suspended from participating in any offering of a penny stock, including: acting as a promoter, finder, consultant, agent or other person who engages in activities with a broker, dealer or issuer for purposes of the issuance or trading in any penny stock, or inducing or attempting to induce the purchase or sale of any penny stock, for a period of six (6) months, effective immediately upon the entry of this Order.



Welsh shall, within 10 days of the entry of this Order, pay a civil money penalty in the amount of \$25,000 to the Securities and Exchange Commission, of which a total of \$5,000 shall be transferred to the MSRB and of which the remaining \$20,000 shall be transferred to the general fund of the United States Treasury.

Reporting Source: Broker

Regulatory Action Initiated

Bv:

UNITED STATES SECURITIES AND EXCHANGE COMMISSION

Sanction(s) Sought: Cease and Desist

Censure

Civil and Administrative Penalty(ies)/Fine(s)

Suspension

Date Initiated: 09/14/2020

Docket/Case Number: 3-19998

Employing firm when activity occurred which led to the

regulatory action:

Roosevelt & Cross, Incorporated

Product Type: Debt-Municipal

Allegations: The Securities and Exchange Commission ("Commission") issued a settled

administrative order against William Welsh ("Respondent"), in which Respondent neither admitted nor denied the findings relating to certain negotiated new issue municipal bond transactions between March 2014 and May 2017. Specifically, the order found that Respondent willfully violated retail order priority provisions in certain new issue municipal bond offerings by selling bonds intended for retail customers to two unregistered brokers known in the industry as "flippers," and that he negligently obtained certain new issue municipal bonds for the firm's account by using the same brokers. The order found this conduct to have violated Section 17(a)(3) of the Securities Act of 1933 and MSRB Rules G-11(k), G-17 and to have caused violations of Sections 15(a)(1) and 15B(c)(1) of the Securities Exchange

Act of 1934.

Current Status: Final

Resolution: Order



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

Yes

Resolution Date: 09/14/2020

Sanctions Ordered: Cease and Desist

Censure

Civil and Administrative Penalty(ies)/Fine(s)

Prohibition Suspension

Other: Penny Stock suspension

Sanction 1 of 2

Sanction Type: Suspension

Capacities Affected: Participation in the offering of a penny stock

Duration: 6 months
Start Date: 09/14/2020

End Date: 03/13/2021

Sanction 2 of 2

Sanction Type: Suspension

Capacities Affected: Broker Dealer, Investment Advisor, Municipal Securities Dealer, Municipal Advisor,

Transfer Agent, NRSRO

 Duration:
 6 months

 Start Date:
 09/14/2020

 End Date:
 03/13/2021

Monetary Sanction 1 of 1

Is Payment Plan Current:

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

No

Total Amount: \$25,000.00

Portion Levied against \$25,000.00

individual:

Payment Plan:

ay month i tam

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Date Paid by individual: 09/14/2020

Was any portion of penalty waived?

No

Amount Waived:

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End of Report



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