

# WHEAT WU

A Professional Limited Liability Corporation

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Of Counsel

## FACSIMILE TRANSMISSION

<b>To:</b>	Inspector General H. David Kotz US Securities and Exchange Commission	<b>Fax:</b>	Personal Privacy
		<b>Phone:</b>	
<b>From:</b>	Katherine Warren / DWB	<b>Fax:</b>	(202) 587-2980
		<b>Phone:</b>	(202) 496-4963
<b>Date:</b>	June 12, 2009	<b>Pages:</b>	39 (including cover)
<b>Re:</b>	SEC OIG Investigation		
<b>Message:</b>			

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June 12, 2009

## VIA FIRST-CLASS MAIL and FACSIMILE

Inspector General H. David Kotz  
U.S. Securities and Exchange Commission  
Office of Inspector General  
100 F Street, N.E.  
Washington, D.C. 20549-2736

Re: SEC OIG Investigation

Dear M. Kotz:

I represent Genevieve Walker-Lightfoot, a former employee of the U.S. Securities and Exchange Commission (SEC) in Washington, D.C. Ms. Walker-Lightfoot worked for the SEC from 2001 to 2006. I am writing in response to requests that my client received from your office to participate in an investigation that you are conducting regarding the SEC's handling of an investigation into Bernard L. Madoff (Madoff) and Bernard L. Madoff Investment Securities (BMIS) from late 2003 to early 2004. During that time, Ms. Walker-Lightfoot was employed by the SEC in the Office of Compliance Inspections and Examinations in the SRO/Market Oversight Group in Washington, D.C. and, among other responsibilities, was assigned to the Madoff investigation.

As you know, Ms. Walker-Lightfoot is no longer employed by the SEC and therefore is not obligated to participate in this investigation. Nonetheless, Ms. Walker-Lightfoot wishes to fully aid in your investigation into this important matter. She does so in spite of her concerns over the manner in which she was treated while employed at the SEC, which will be described in detail below and which resulted in her receiving a favorable settlement from the SEC for her EEO claim of hostile work environment. She also does so in spite of her concern over Personal Privacy from your office having insinuated that her failure to speak with your office might result in negative opinions of Ms. Walker-Lightfoot's job performance appearing in the IG report. Such an approach is inappropriate and insulting to a career public servant who received only exemplary performance evaluations while at the SEC and who appears to be the only person working at the SEC on the 2003/2004 Madoff investigation who raised any serious concerns about the documents and explanations provided by Madoff during that investigation.

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A summary of Ms. Walker-Lightfoot's participation in the 2003/2004 Madoff investigation appears below. That summary is followed by detailed responses to a list of topics provided by Personal Privacy We trust that this information will aid your understanding of what occurred during and after the 2003/2004 Madoff investigation.

## **Ms. Walker-Lightfoot's Role in the Madoff Investigation**

In April 2004, Ms. Walker Lightfoot was removed from her position as the lead investigator in an SEC investigation into Madoff's trading activities in various hedge funds, including but not limited to Fairfield Sentry, Tremont, Yeshaya, and other major feeder funds. Her removal from this Madoff investigation came shortly after she raised questions about the veracity and completeness of documents and explanations provided by Madoff regarding his trading activities. Ms. Walker Lightfoot's direct supervisor on the Madoff investigation, Mark J. Donohue, informed her of her removal from the investigation. Donohue worked under the Assistant Director in charge of the Madoff investigation, Eric J. Swanson, who would marry Bernard Madoff's niece, Shana Madoff, approximately one year later.

Ms. Walker Lightfoot's work on the Madoff investigation commenced in late 2003 following a complaint made to the SEC regarding Madoff's trading activities. In early 2004, the SEC received a number of documents in response to a request that had been made to Madoff regarding that complaint. On March 10, 2004, after reviewing those documents, Ms. Walker-Lightfoot sent an e-mail to Donohue, her immediate supervisor on the investigation, requesting some follow-up documents and questioning the information in the documents that had been provided. It was Ms. Walker-Lightfoot's belief that the SEC did not have enough information to conduct the investigation. Of the documents Ms. Walker-Lightfoot did review, she noted among other things that trading and settlement dates varied for accounts that traded according to the "split-strike conversion" strategy. Ms. Walker-Lightfoot told Donohue and Swanson that if the specific conditions mentioned by Madoff were a prerequisite for the "split-strike conversion" strategy to activate, then the trade and or settlement dates should not have varied for those accounts per her review of trading account documentation provided by Madoff. Moreover, the trade dates versus settlement dates were inexplicably inconsistent and varied when compared to the securities industry standard of T+3 (trade date plus 3 days). This led Ms. Walker-Lightfoot to believe that either the strategy did not work as stated and/or the account statements and other documentation provided to the SEC were inaccurate. Ms. Walker-Lightfoot communicated her concerns to Donohue and Swanson directly and in the March 10, 2004 e-mail.

On March 23, 2004, after reviewing documents submitted by Madoff, Ms. Walker-Lightfoot sent another e-mail to Donohue explaining that the mechanics of Madoff's split-strike conversion strategy did not work as Madoff had described it to SEC staff. In that e-mail, Ms. Walker-Lightfoot explained that, to the extent Madoff had claimed that the model used to execute the split-strike conversion orders of clients defined the conditions that were to exist before executing the strategy, significant differences should not exist between the trading activity in the Tremont

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and Sway accounts, including the trade dates listed in the documents provided. Moreover, equity/hedge restructuring activity, a component of the “split-strike strategy” as described by Madoff, was not accurately reflected in the account trading documentation provided to the SEC. Ms. Walker-Lightfoot provided her thoughts to Donohue and Swanson and noted that the SEC needed to follow-up with Madoff as to the mechanics of the strategy and the accuracy of the account trading statements provided to the SEC.

At the same time that Ms. Walker-Lightfoot was leading the Madoff investigation and providing her findings to Donohue and Swanson, she was meeting with resistance from them. For example, she was excluded from meetings related to the Madoff investigation. That is because Donohue continuously called impromptu meetings of the Madoff team when Ms. Walker-Lightfoot was away from her desk even though Donohue’s office was right next to hers, and it would have been obvious to him and to anyone else meeting with him in his office, including Swanson, that Ms. Walker-Lightfoot was not in her office at the time the meeting was called. When she was able to join an impromptu meeting, having learned about it after it had already started, Ms. Walker-Lightfoot was still tardy and would miss important information shared at the beginning of the meeting.

Finally, on April 7, 2004, Ms. Walker-Lightfoot was told to “concentrate on mutual funds,” an investigation that already had 11 SEC employees working on it, and on April 22, 2004, Donohue told Ms. Walker-Lightfoot to give all of her documentation from the Madoff investigation to a co-worker, Jacqueline Wood, who was to remain on the Madoff investigation as the sole dedicated attorney. It is Ms. Walker-Lightfoot’s understanding that, shortly after her removal from the Madoff investigation, the investigation was closed and the files boxed up and sent off site for storage. Ms. Walker-Lightfoot’s office was directly adjacent to Ms. Wood’s office, and Ms. Walker-Lightfoot observed Ms. Wood boxing up the Madoff files in record retention boxes typically used for storage of SEC files.

During her tenure as the lead investigator on the Madoff investigation, Ms. Walker-Lightfoot noticed a dramatic negative change in her work environment. After her removal from the Madoff investigation, Ms. Walker-Lightfoot continued to be treated poorly, although she had been performing on a consistently above average level, receiving full grade promotions yearly, up to her full performance level of an SK-14, with merit and step increases thereafter. Yet, after raising her concerns about the Madoff investigation, Ms. Walker-Lightfoot became a victim of a pattern and practice of workplace harassment so intolerable that in August of 2005 she filed a complaint with the Equal Employment Opportunity Commission (EEOC) alleging that Mark Donohue and <sup>former OCIE Branch Chief</sup> [REDACTED] who was supervised by Donohue, were creating a hostile work environment for her. It should be noted that the first person in the SEC to whom Ms. Walker-Lightfoot complained about this treatment was Eric Swanson, who did nothing to relieve her situation, thus prompting her to file her complaint with the EEOC. Ultimately, the SEC settled that complaint favorably for Ms. Walker-Lightfoot. After settling the EEO claim, Ms. Walker-Lightfoot left the SEC and began working at the Federal Reserve Board, where she remains employed to this date.

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In sum, Ms. Walker-Lightfoot raised concerns about Madoff's alleged "split-strike conversion" strategy as early as 2004. Her concern stemmed from her review of the account statements and other documents for the Fairfield, Tremont, Sentry, and Yeshaya funds, which revealed that those statements were inaccurate and that the options trading activity for many of the transactions was not accurately reflected on the account statements. Of course, we now know that the so called "split-strike conversion strategy," was simply a front for Madoff's Ponzi scheme, that the statements flagged by Ms. Walker-Lightfoot were actually fabricated by Madoff, and that Madoff may not have effected any trades over the last 13 years.

In response to the list of topics provided to us by Mr. Wilson, my client responds as follows:

## **I. Brief Background**

Ms. Walker-Lightfoot has a B.A. in Government and International Relations with a minor in French and a paralegal certificate from Georgetown University. She also has a J.D. and a certificate in Comparative and International Law from the Columbus School of Law at the Catholic University of America (CUA Law) and an MBA from the University of Maryland at College Park's Smith School of Business.

Between college and law school, Ms. Walker-Lightfoot was employed as a paralegal first with the Department of the United States Navy within the Judge Advocate General's Office (JAG) at the Pentagon and then with a trust and estates law firm. During law school, Ms. Walker-Lightfoot won first place for best brief in the Securities Law Moot Court Competition and placed third in the oral arguments portion of the competition. She was accepted into the application-only SEC Student Observer Program for law interns after her first year in law school. During her participation in that program, Ms. Walker-Lightfoot interned in the Office of Investor Education and Assistance (OIEA) where she worked on general securities law matters. As a law student, she took a series of rigorous business and finance law based elective courses in CUA Law's securities law program. She also worked as a law clerk in the General Counsel's office of the National Archives and Records Administration and interned in the Office of the Chief Counsel for Export Control at the U.S. Department of Commerce and the NASD's (now FINRA) Office of Dispute Resolution, where she worked on securities arbitration and mediation cases.

Ms. Walker-Lightfoot graduated from CUA Law School in May of 1999, took and passed the Maryland state bar examination, and was admitted to practice law in the state of Maryland as of January 2000. In August of 1999, Ms. Walker-Lightfoot went to work in the American Stock Exchange's (AMEX) Member Firm Regulation Department in New York, where she conducted equities- and options-related investigations of brokerage firms and registered representatives. Of particular note, she participated in one investigation that led to the expulsion of a specialist firm from the AMEX trading floor for various securities violations. Moreover, she provided legal expertise during various equities and options trading investigations. She also referred various investigations to the SEC for manipulative and violative trading activity such as insider trading

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and market manipulation. While employed at the AMEX, Ms. Walker-Lightfoot received bonuses as well as a merit raise. As part of her employment, she took advantage of extensive training in options trading at the New York Institute of Finance as well as extensive on-the-job training and experience via being a member of the Member Firm Regulation Department and surveilling the AMEX trading floor for securities violations. As you can see, Ms. Walker-Lightfoot's education and employment experiences made her uniquely qualified to work in the Self-Regulatory Organization (SRO)/Market Oversight Group in the Office of Compliance Inspections and Examinations (OCIE) at the SEC.

In March of 2001, Ms. Walker-Lightfoot resigned from the AMEX after accepting a position in the Office of Compliance Inspections and Examinations (OCIE) in the SRO/Market Oversight Group at the SEC in Washington, D.C. Her second line supervisor for the entire duration of her time in OCIE was Swanson. Ms. Walker-Lightfoot handled various matters while employed at OCIE and led an examination after just six months in the position. She began work at the SEC as a GS-11 (now SK-11) and was promoted annually until reaching her full performance grade level of SK-14. Her final grade and step level at the SEC was as an SK-14 step 16. In addition to annual promotions, Ms. Walker-Lightfoot also received annual cash awards and merit increases in addition to consistently positive and praiseworthy narrative annual performance evaluations. She did not have any negative performance issues while an employee of the SEC, nor did she receive any negative commentary on her narrative evaluations. While employed at the SEC, Ms. Walker-Lightfoot also participated in options training at the Chicago Board of Options Exchange (CBOE). Additionally, she was a member of the OCIE teams that received recognition for work on the Research Analysts' Conflicts of Interest Global Settlement Team as well as the Mutual Fund Reform Team. Moreover, as her narrative performance evaluations reflect, Ms. Walker-Lightfoot found significant securities law violations and/or made significant contributions to every single project she worked on as an SEC employee from April 16, 2001 through January 27, 2006. As noted above, Ms. Walker-Lightfoot resigned from the SEC on January 27, 2006 after Personal Privacy settlement of an EEO claim she filed against Mark Donohue and former OCIE Branch Chief for creating a hostile work environment for her at the SEC in OCIE. Personal Privacy was supervised by Donohue, and both were supervised by Swanson.

Ms. Walker-Lightfoot has been employed at the Federal Reserve Board in Washington, D.C. since January 30, 2006. She initially worked in the Risk Management Group within the Banking Supervision and Regulation Division as a subject matter expert in securities law and private equity matters concerning banking organizations. In May of 2008, she transferred to the Large Institutions Group within the Division of Banking Supervision and Regulation with responsibility for Bank of NY Mellon Corporation, the Depository Trust Corporation, and State Street Corporation. She also continued to serve as a securities law subject matter expert, speaking at Federal Reserve Bank Conferences, acting as a liaison with the SEC on various securities law matters, and advising senior management within the Division of Banking Supervision and Regulation on securities matters impacting banking organizations such as Regulation R, auction rate securities, variable rate demand notes, and mutual funds. Her most

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notable accomplishment at the Federal Reserve Board has been briefing Chairman Bernanke on the effects of sponsored and advised mutual funds on Federal Reserve supervised banking institutions during the market turmoil that began in 2007. Ms. Walker-Lightfoot has received two cash awards during the last two performance cycles as well as a rating of "EXTRAORDINARY" during her most recent performance review for 2008.<sup>1</sup>

## **II. General Knowledge of Reputation of Bernard L. Madoff Investment Securities and Bernard Madoff**

Ms. Walker-Lightfoot understood the general reputation of BMIS and Madoff to be that it was difficult to become an investor with them and that they had a great strategy for earning money. BMIS' investment strategy was not to be questioned, and anyone who did so was disparaged by BMIS and Madoff as being "too stupid" to understand.

## **III. OCIE Exams Prior to 2003**

### **A. Knowledge of any prior OCIE examinations of Madoff Securities**

Ms. Walker-Lightfoot has no knowledge of any prior OCIE examinations of BMIS.

## **IV. 2003-2005 Cause Examination**

### **A. General Recollections of Cause Examination, including recollections of:**

#### **a. Madoff Examination Planning Memo;**

Ms. Walker-Lightfoot is aware of no planning memo with regard to the investigation at issue. In her experience, it was not routine for there to be a planning memo for every investigation.

#### **b. Initial Tip/Complaint that Led to Examination;**

Ms. Walker-Lightfoot does not know where the tip or complaint came from which led to the 2003 examination. She has not seen a written complaint or been told the substance of any oral complaint or tip. It appeared to Ms. Walker-Lightfoot that the tip or complaint came to the SEC through Associate Director John McCarthy.

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<sup>1</sup> Ms. Walker-Lightfoot's evaluations from her work at the SEC are attached as Exhibit A and her resume is attached as Exhibit B. A rating of "EXTRAORDINARY" is the Federal Reserve's highest rating, reserved for a limited number of employees. It indicates performance that substantially and consistently exceeds the Board's high standards and expectations and is accompanied by a substantial percentage increase in salary.

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## **c. First Document Request;**

Ms. Walker-Lightfoot has not seen a copy of the first document request sent to BMIS and Madoff from the SEC.

## **d. Conference calls with Madoff;**

Ms. Walker-Lightfoot was not a party to any conference calls that included Madoff or anyone from BMIS.

## **e. Second Document Request;**

Ms. Walker-Lightfoot recalls the second document request. Her suggestions for follow up questions with regard to the second document request were all contained in e-mails that are now in the possession of the SEC OIG and which are described above.

## **f. Additional Questions Raised by Walker;**

It is Ms. Walker-Lightfoot's recollection that most of the questions she raised during the course of the Madoff investigation were included in e-mails which are now in the possession of the SEC OIG

## **g. Analysis of Madoff trading performed by Walker (comparison of trading in accounts & collar)**

Ms. Walker-Lightfoot compared the stated investment strategy of BMIS with what the documents revealed about what trades were actually performed and on what dates. To the extent that this information did not match up, she told her supervisors and suggested additional information and documents that should be provided by BMIS.

## **V. Communications with NYRO Examiners about NYRO Examination**

Ms. Walker-Lightfoot had no communications with the NYRO Examiners and was not aware that the investigation had been transferred to the NYRO examiners until recently. In her experience, when investigations were transferred to NYRO, there would be a telephone call to bring the NYRO up to speed on what work had been done on the investigation to that point. She is unaware of any such telephone call regarding the transfer of the BMIS investigation.

## **VII. Walker's View on Team Assigned to Madoff Cause Examination and Their Approach to Examinations.**

Ms. Walker-Lightfoot's "view" of the team assigned to the Madoff investigation was that they did not have much experience in equity and options trading. Rather, their experience was in

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general litigation. During her tenure at the SEC, Ms. Walker-Lightfoot observed many people who appeared to be hired by the SEC more for their personal connections to other SEC employees than for any substantive experience or knowledge they possessed. It appeared that these employees were supposed to learn on the job, which was difficult to do given the nature of the SEC's work.

We trust that this information will aid in your investigation.

Sincerely,



Julie Grohovsky

Cc:

Personal Privacy



## **Genevieve E. Walker-Lightfoot**

**Admitted to Practice Law in the State of Maryland, January 2000**

### **Federal Reserve Board of Governors**

**Banking Supervision and Regulation-Large Institutions Group**, 20<sup>th</sup> St. and Constitution Ave. N.W. Washington, D.C. 20551  
**Supervisory Financial Analyst**, May 2008-Present

- Manage portfolio activities concerning Bank of New York Mellon, State Street Corporation, and the Depository Trust and Clearing Corporation
- Advise management on asset management, brokerage firm and transfer agent activities of banking organizations
- Create and design supervisory program concerning securities activities within banks

### **Federal Reserve Board of Governors**

**Banking Supervision and Regulation-Risk Management Group**, 20<sup>th</sup> St. and Constitution Ave. N.W. Washington, D.C. 20551

**Supervisory Financial Analyst**, January 2006-May 2008

- Briefed Chairman Bernanke on the effects of the market turmoil on bank sponsored and advised investment funds
- Made management presentations on asset management, broker-dealer, MSRB, SEC and private equity matters
- Division representative on interagency working group for the implementation of Regulation R and the revisions to the 1994 Nondeposit Investment Products Retail Sales Statement

### **U.S. Securities & Exchange Commission**

**Office of Compliance Inspections and Examinations**, 100 F Street, N.E. Washington, D.C. 20549  
**Attorney**, April 2001-January 2006

#### **Chairman's Award for Excellence 2004:** **Mutual Fund Reform Team**

#### **Capital Markets Award 2003:**

**Research Analyst and Investment Banking Personnel Conflicts of Interest Global Settlement Team**

- Managed compliance reviews of regulated entities, including the formulation of strategy and objectives
- Made policy recommendations regarding compliance with federal laws and regulations
- Recommended remediation to be implemented by the senior management of regulated entities
- Analyzed financial statements, research reports, financial transactions and executive compensation data for legal liability
- Drafted reports detailing findings and recommendations resulting from compliance reviews
- Assisted in trial preparation, including depositions related to SEC enforcement referrals

**The American Stock Exchange (Formerly an NASD company, now FINRA)**

**Market Investigations Department**, 86 Trinity Place, New York, N.Y. 10006  
**Senior Trading Analyst**, August 1999-March 2001

#### **Market Investigations Department Liaison to Investigation of Specialist Unit and AMEX/NASD Member Firm Re: SEC Rule 10b-18 Violations-- Investigation Resulted in Industry Expulsion of a Member of the Specialist Unit**

- Special project liaison to the AMEX's Enforcement Department
- Reviewed trading in AMEX equities and options for violations of exchange rules and federal securities laws
- Conducted numerous insider trading investigations and other reviews of violative trading violations, some of which resulted in SEC referrals
- Conducted short sale violation investigations concerning firms' affirmative obligation requirement
- Conducted investigations into allegations of unauthorized trading
- Prepared memoranda and NASDR and SEC referrals based upon investigative findings
- Conducted on-the-record interviews/depositions

**NASD Regulation, Inc., an NASD Company (now FINRA)**

**Office of Dispute Resolution**, 1735 K Street N.W., Washington, D.C. 20006  
**Legal Extern**, January 1999-March 1999

#### **Successfully Completed Arbitrator Training and Examination**

- Assisted in conducting arbitration hearings, including managing the pre-hearing and discovery process
- Drafted arbitration awards and prepared/audited financial control documents pertaining to fees and fines imposed
- Conducted internal audit reviews of financial control documents relating to arbitration awards

**U.S. Department of Commerce**

**Office of the Chief Counsel for the Bureau of Industry and Security (formerly the Bureau of Export Control),**  
14<sup>th</sup> Street and Constitution Ave., N.W., Washington, D.C. 20230

**Legal Extern, September 1998-November 1998**

- Assisted with the administrative enforcement of export control laws and regulations concerning sensitive goods and technologies and attended hearings on Capitol Hill related to commerce matters
- Researched and drafted memoranda concerning the discriminatory impact of export control laws under Title VII

**National Archives & Records Administration**

**Office of the General Counsel, 8601 Adelphi Road, College Park, MD 20740-6001**

**Law Clerk, May 1997-June 1998**

- Drafted internal memoranda pertaining to NARA regulations and relevant federal law
- Deputy Designated Agency Ethics Official responsible for dispensing ethics advice
- Designated alternative dispute resolution committee member for the Office of the General Counsel

**U.S. Securities & Exchange Commission**

**Office of Investor Education & Assistance, 100 F Street, N.E. Washington, D.C. 20549**

**Law Clerk, September 1997-December 1997**

- Investigated allegations of fraud made by investors involving misrepresentation and nondisclosure
- Prepared memoranda interpreting federal securities rules and regulations

**OTHER PROFESSIONAL EXPERIENCE**

**Sierra Villas Board of Directors**

**9198 Red Branch Road Columbia, MD 21045**

**Director, February 2009-Present**

- Manage community association financial and community affairs as an elected director to the board

**Martin Luther King Jr. Holiday Commission**

**Howard County, Maryland Government, 6751 Columbia Gateway Drive, Columbia, MD 21046**

**Commissioner (Appointed by Howard County Executive Kenneth Ulman), October 2008-Present**

- Coordination of appropriate activities and ceremonies to honor the ideals and legacy of Dr. King
- Assist local governments and private organizations with respect to the observance of county and federal holidays honoring the birthday of Dr. King

**Cable Compliance Commission**

**Montgomery County, Maryland Government, 101 Monroe Street, Rockville, MD 20850**

**Commissioner (Appointed by the Montgomery County Executive Douglas Duncan), March 2003-December 2003**

- Adjudicate subscriber complaints, pursuant to the Maryland Administrative Procedures Act, concerning customer cable service or any other product or service that uses the equipment of the applicable franchise agreement, such as one-way or interactive video, audio, data and information services
- Impose fines on cable companies for noncompliance with the applicable franchise agreement
- Provide regulatory policy advice to the Commission's assigned county attorney and the County Council

**Alpha Kappa Alpha Sorority, Incorporated, Iota Lambda Omega Chapter, Howard County, MD**

**University of Maryland at College Park, R.H. Smith School of Business, M.B.A. Program, College Park, MD 20740**

**M.B.A. Program Teaching Assistant, "Doing Business in the Middle East and North Africa", October 2007-January 2008**

**University of Maryland at College Park, College Park, MD 20740**

**Undergraduate Instructor, August 2004-December 2004**

**EDUCATION**

**M.B.A., May 2007**

**The University of Maryland, Robert H. Smith School of Business, College Park, Maryland**

**Juris Doctor and Certificate, Comparative and International Law Institute, May 1999**

**The Catholic University of America, Columbus School of Law, Washington, D.C.**

**Honors: Securities Law Moot Court Competition 1999**

**1<sup>st</sup> Place Best Brief Category 2<sup>nd</sup> Place Best Overall Category 3<sup>rd</sup> Place Oral Arguments Category**

**Paralegal Certificate, August 1996**

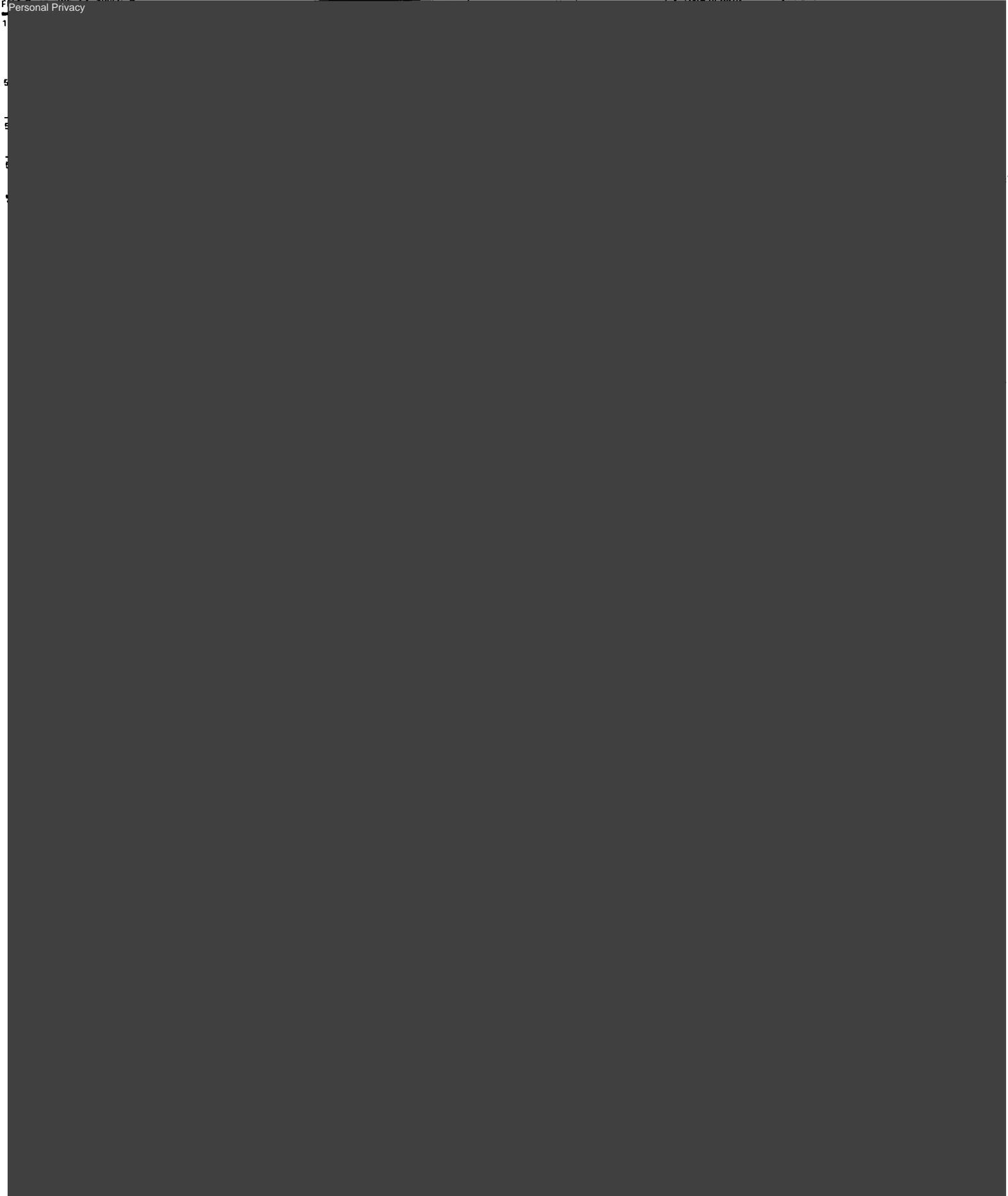
**Bachelor of Arts in Government and International Relations, minor in French, May 1995**

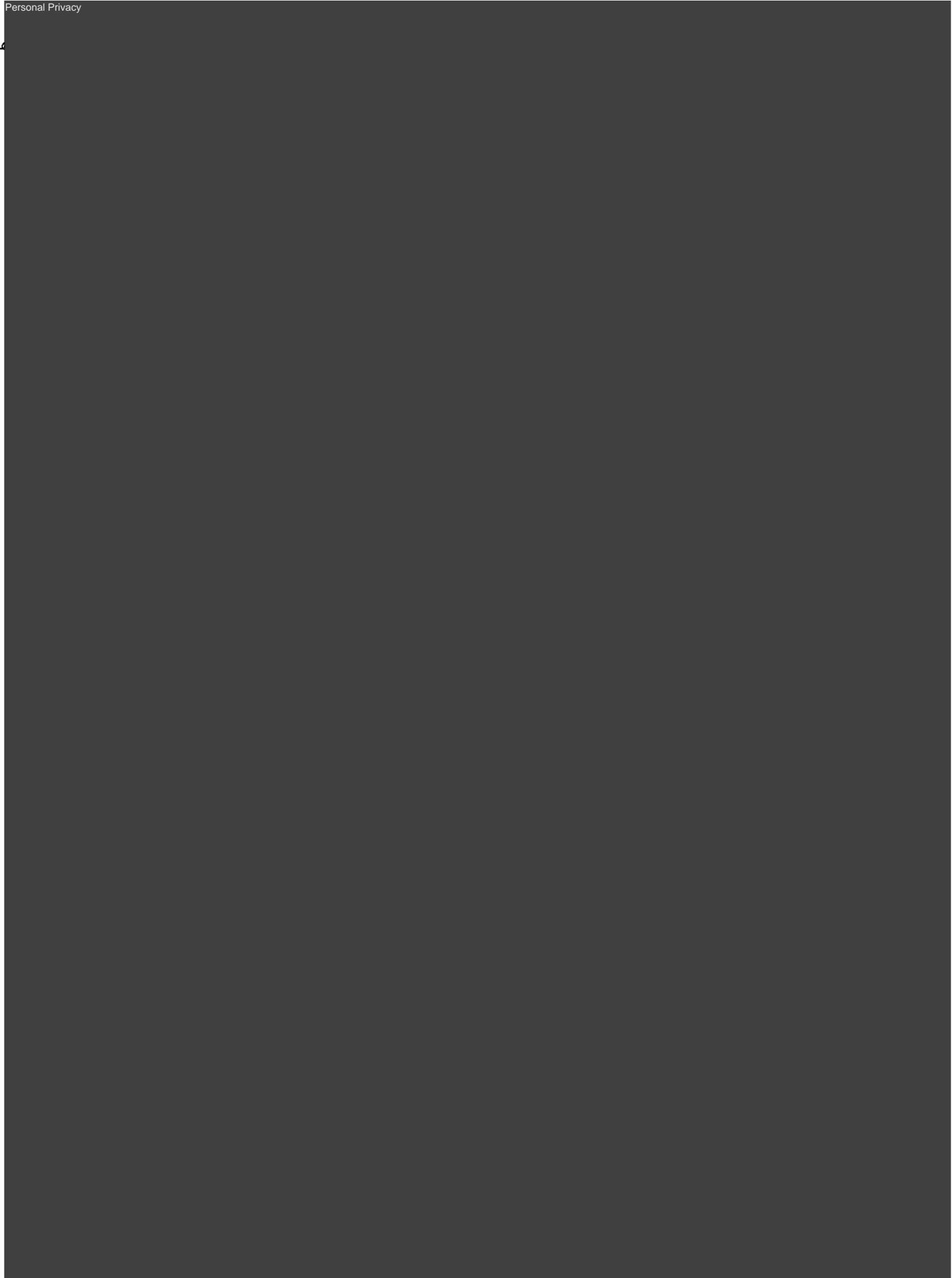
**Georgetown University, Washington, D.C.**

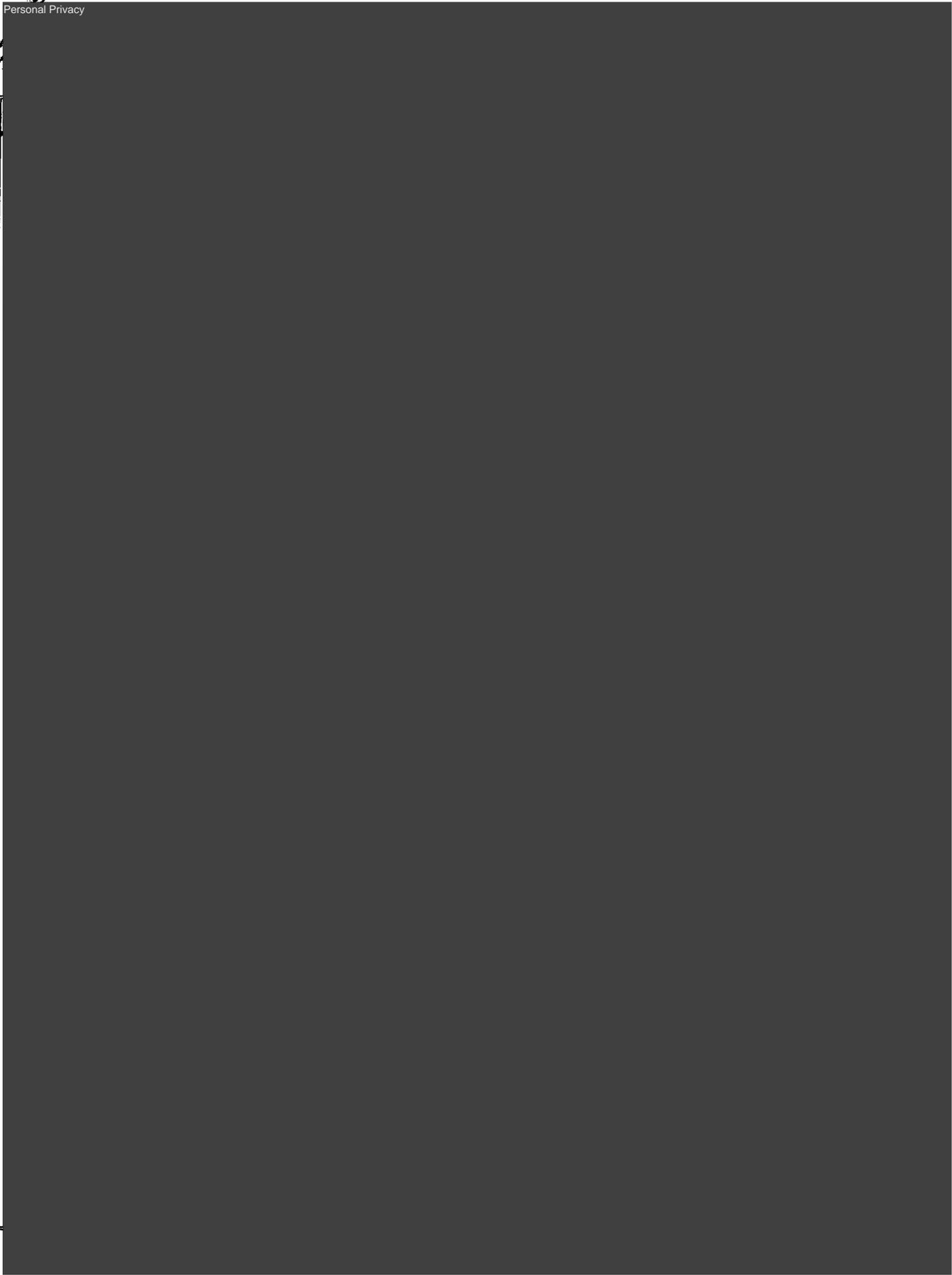
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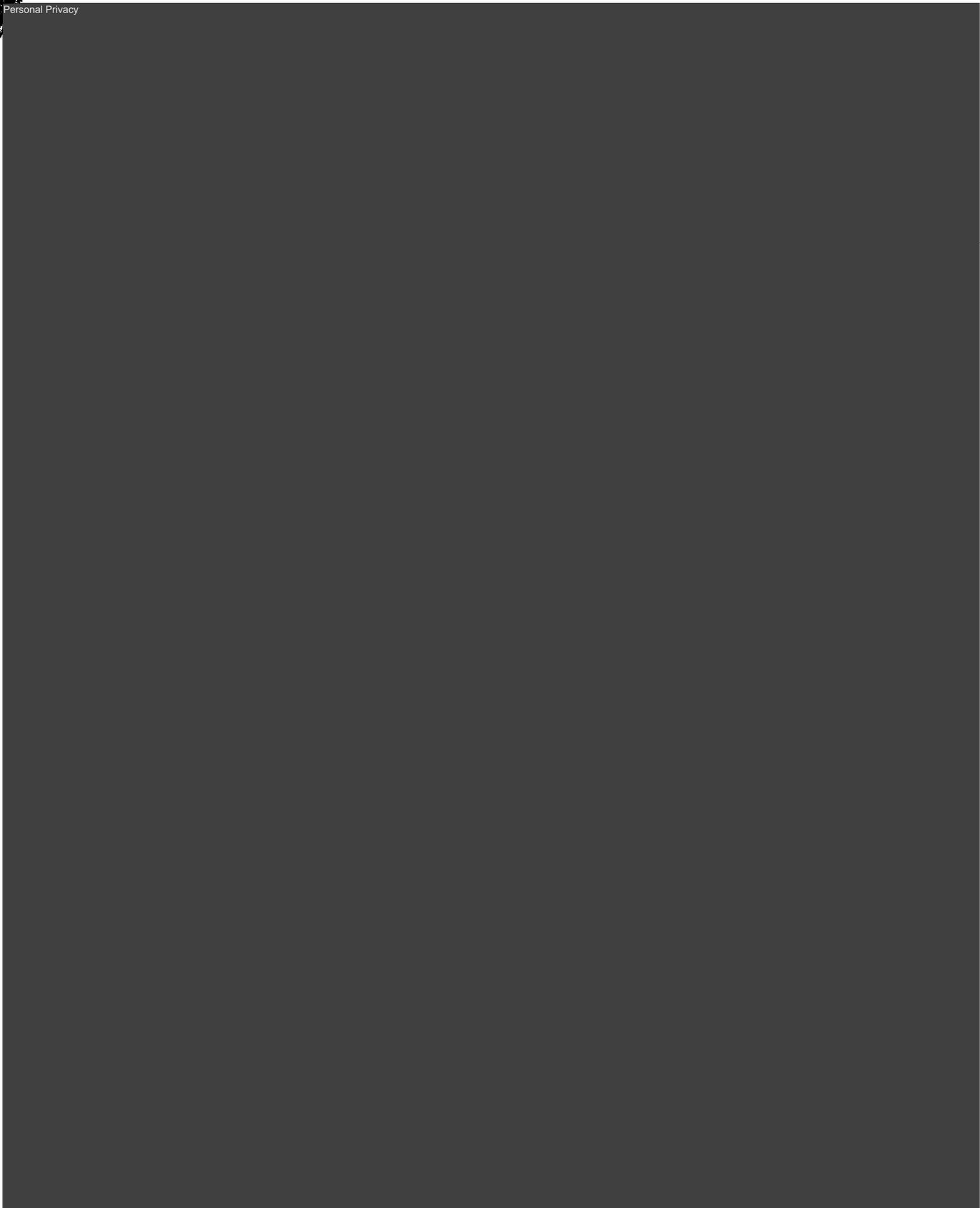
3. Date of Birth

4. Effective Date











**U. S. Securities and Exchange Commission  
Performance Plan and Evaluation**

Personal Privacy



Personal Privacy



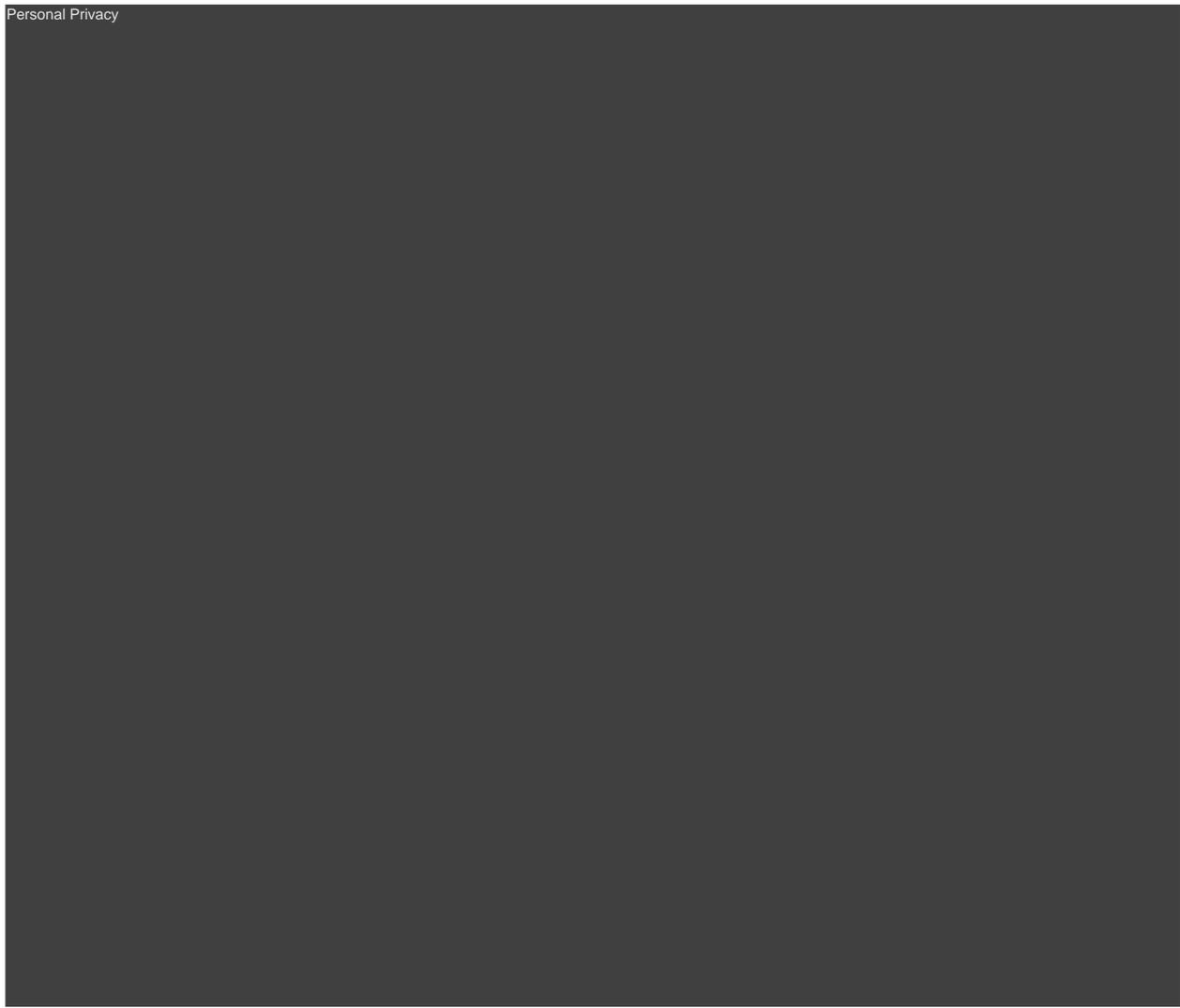
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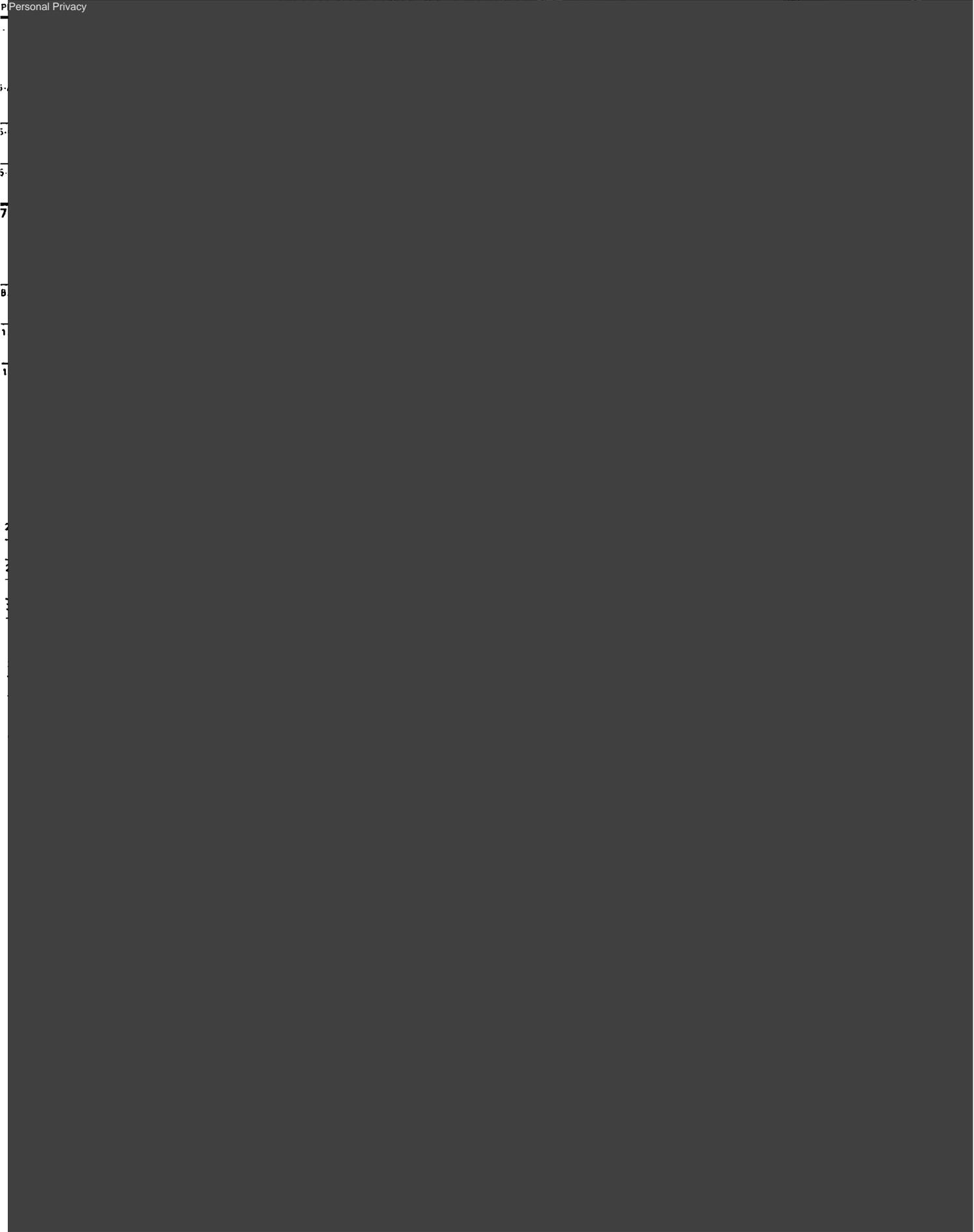
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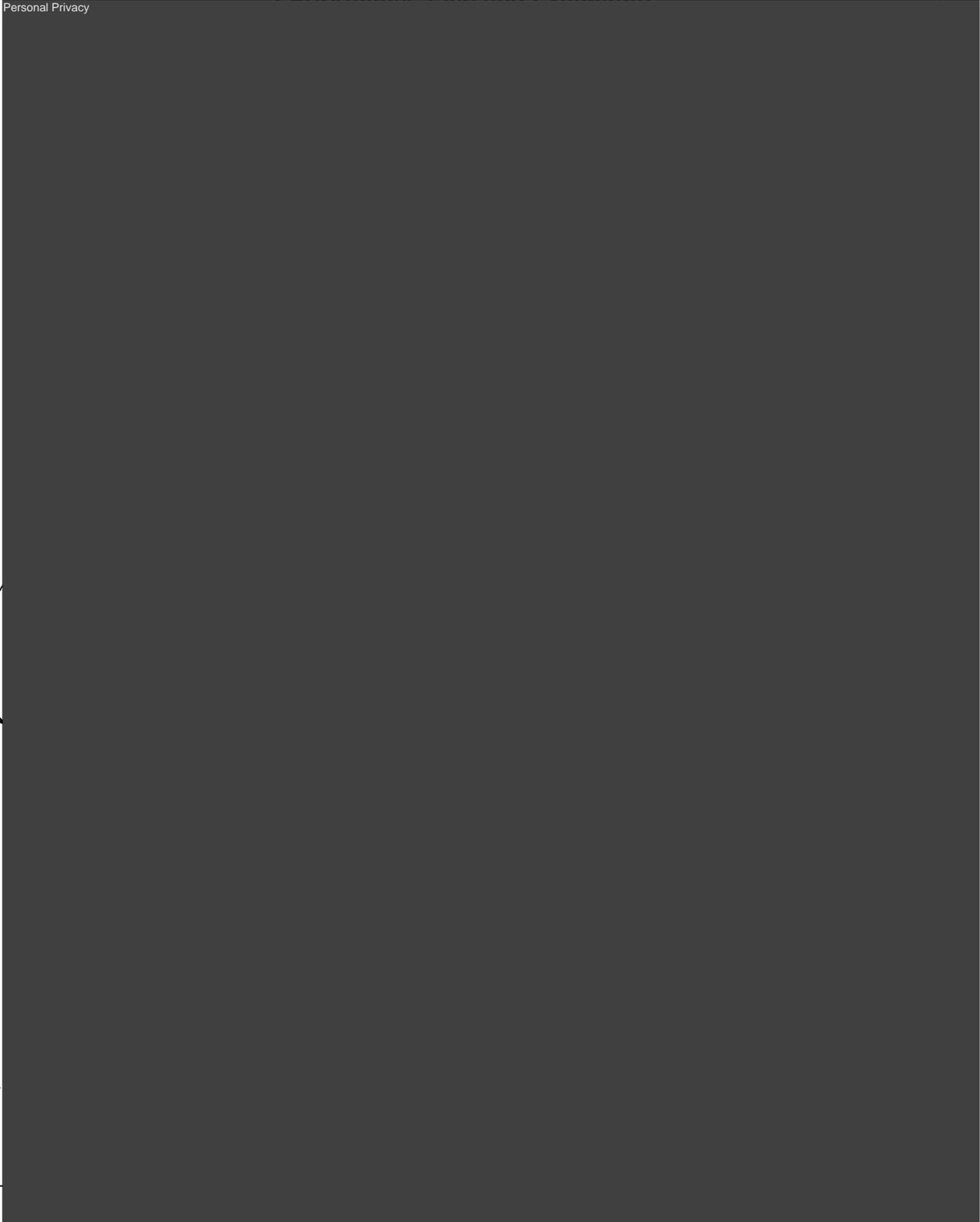


## NOTIFICATION OF PERSONNEL ACTION



**U. S. Securities and Exchange Commission**  
**Performance Plan and Evaluation**

Personal Privacy



**OCIE, Market Oversight, SRO 1**  
**Supervisor's Statement of Employee's Accomplishment**

Personal Privacy



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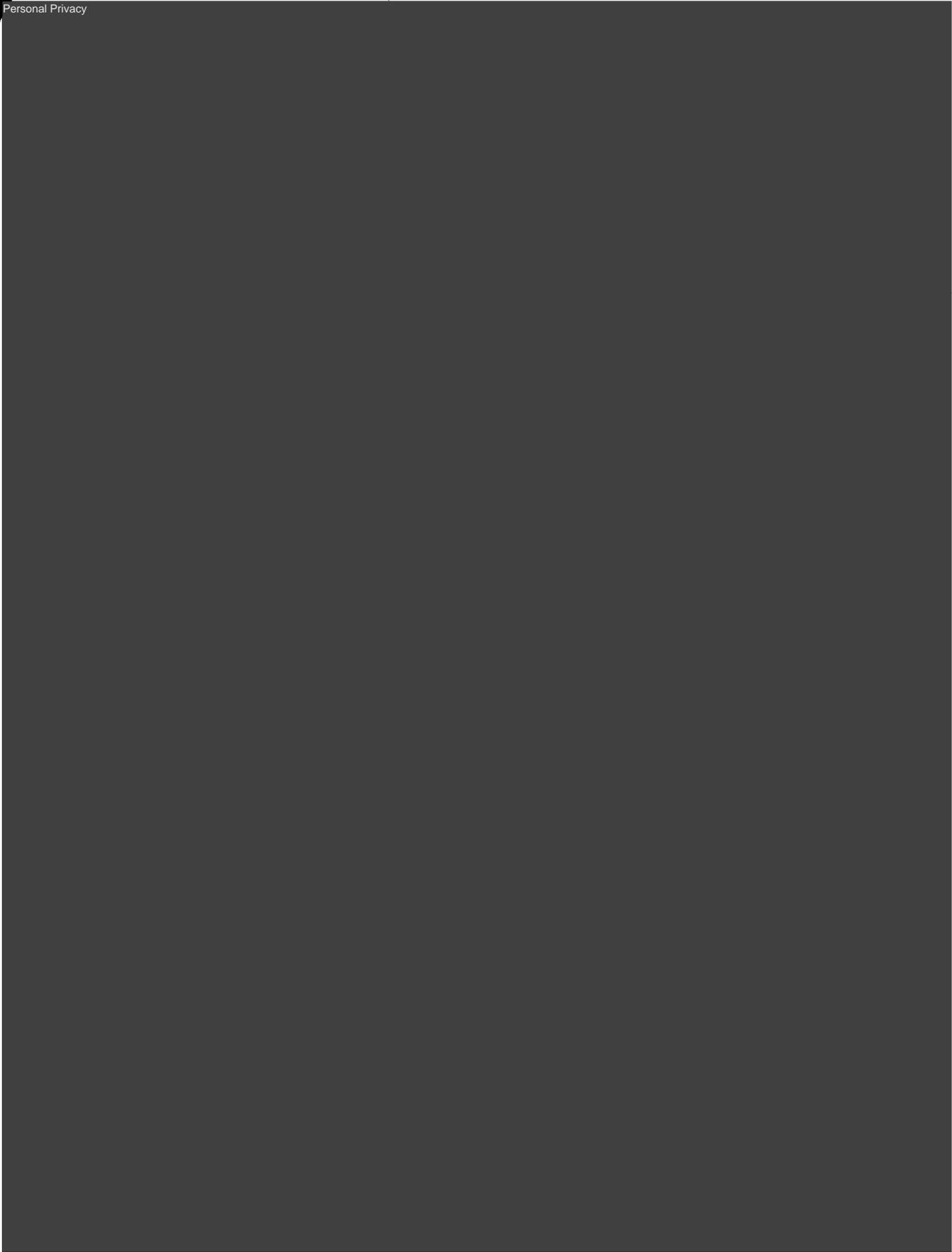


**Statement of Employee Contributions-Genevieve Walker**  
**"Pay-for-Performance" Cycle October 3, 2003 -April 30, 2004**

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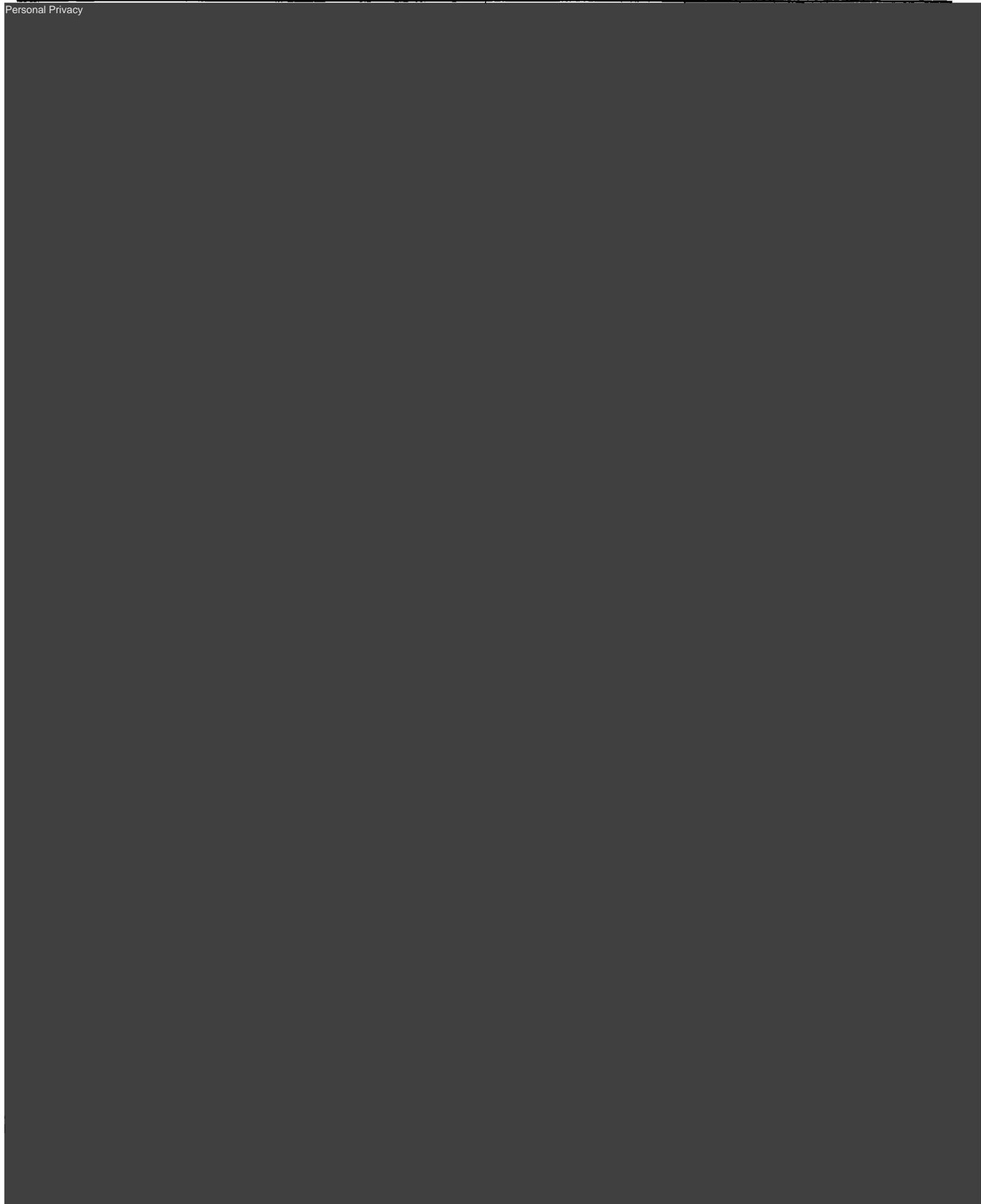


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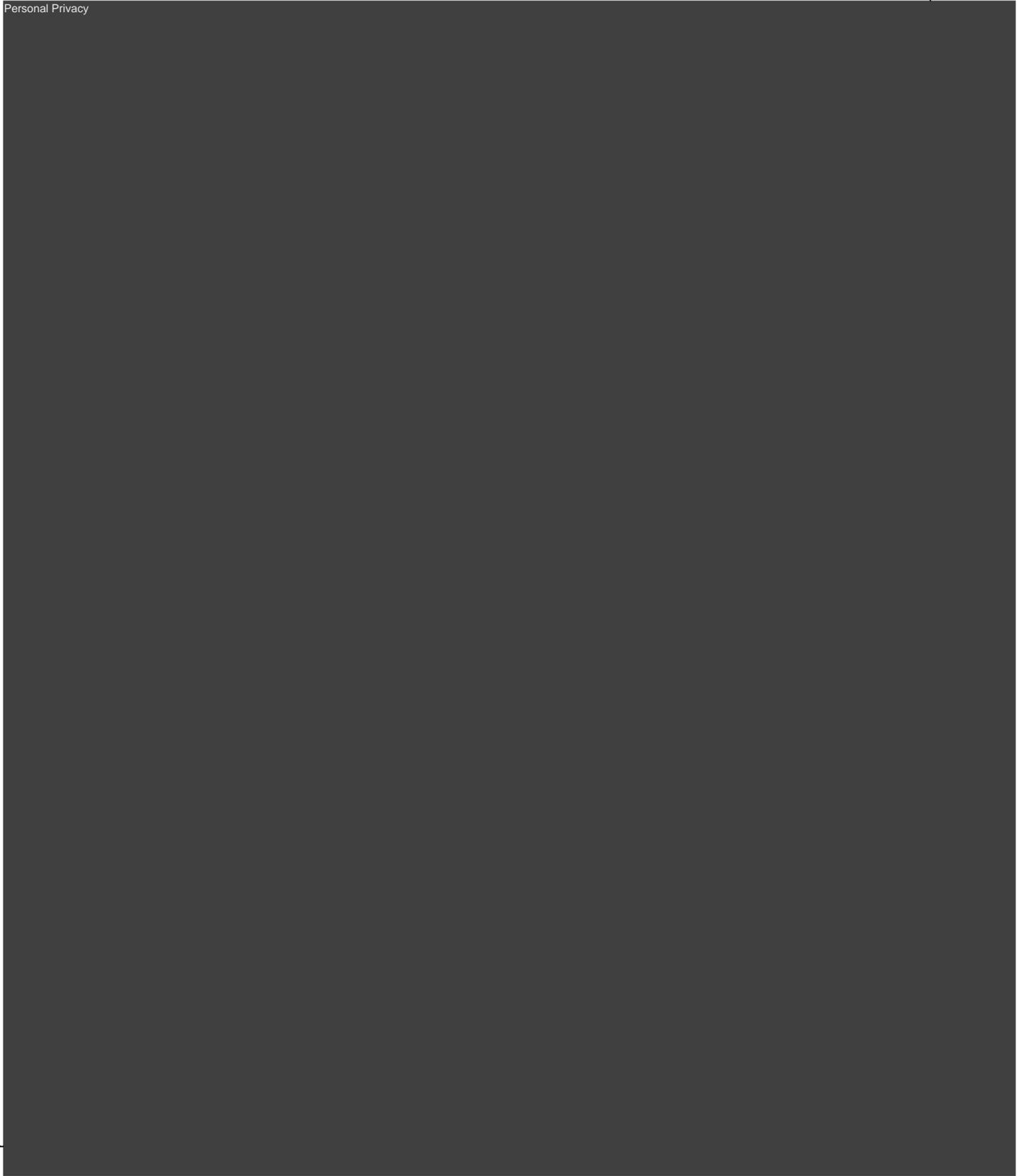
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**U. S. Securities and Exchange Commission  
Performance Plan and Evaluation**

Personal Privacy



**OCIE, Market Oversight, SRO 1**  
**Supervisor's Statement of Employee's Accomplishment**

Personal Privacy



Personal Privacy



**Statement of Employee Contribution-Genevieve E. Walker**  
**"Pay-for-Performance" Cycle-May 1, 2004 through April 30, 2005**

Personal Privacy



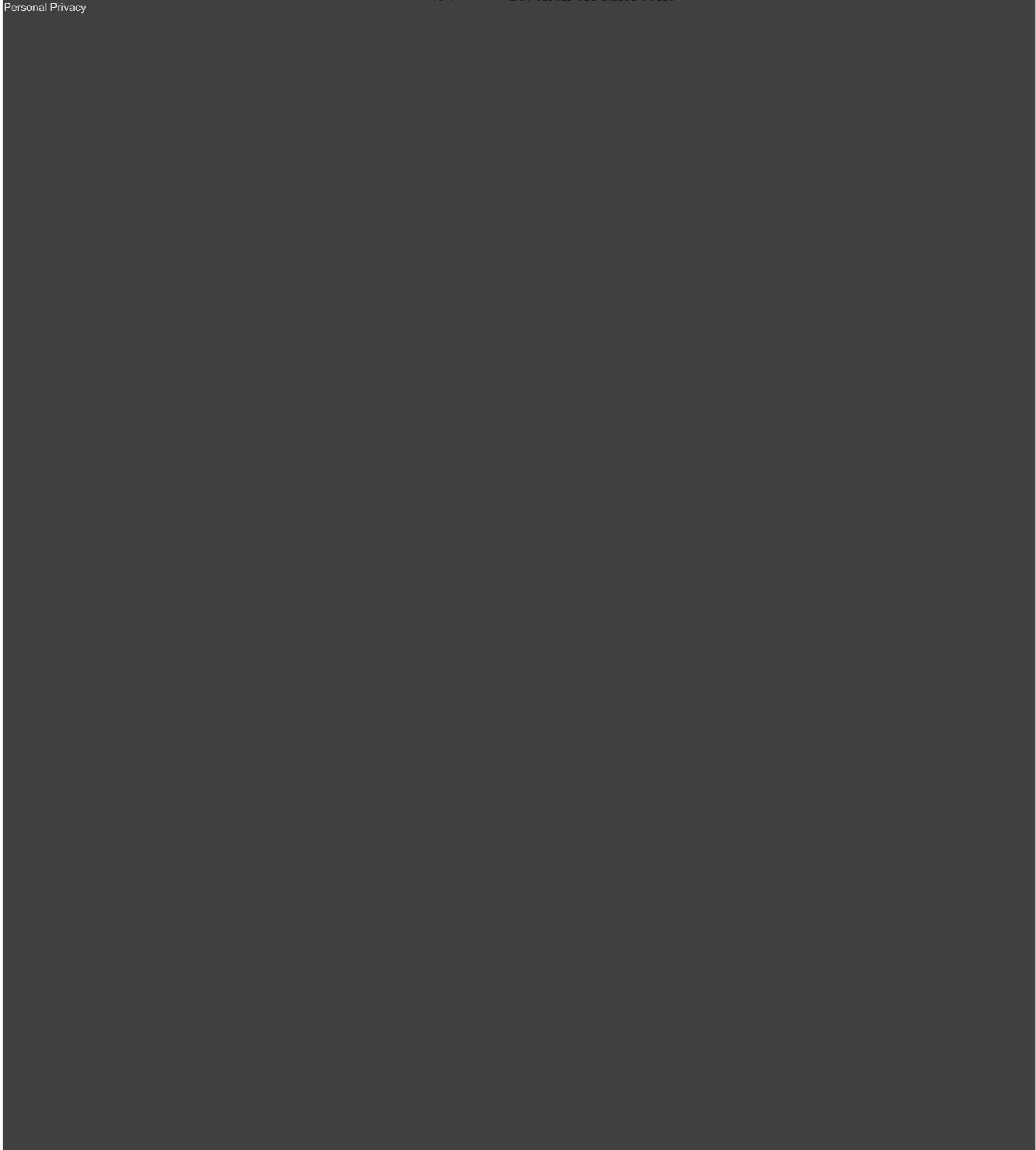
Personal Privacy



Submitted 7/29/05

**U.S. SECURITIES AND EXCHANGE COMMISSION  
STUDENT LOAN REPAYMENT  
RECOMMENDATION AND APPROVAL**

Personal Privacy



Personal Privacy



Personal Privacy

