

**UNITED STATES OF AMERICA**  
**Before the**  
**SECURITIES AND EXCHANGE COMMISSION**

**SECURITIES EXCHANGE ACT OF 1934**  
**Release No. 102268 / January 23, 2025**

**INVESTMENT ADVISERS ACT OF 1940**  
**Release No. 6836 / January 23, 2025**

**ADMINISTRATIVE PROCEEDING**  
**File No. 3-22444**

**In the Matter of**

**CHRISTOPHER  
BOOTH  
KENNEDY,**

**Respondent.**

**ORDER INSTITUTING  
ADMINISTRATIVE PROCEEDINGS  
PURSUANT TO SECTION 15(b) OF THE  
SECURITIES EXCHANGE ACT OF 1934 AND  
SECTION 203(f) OF THE INVESTMENT  
ADVISERS ACT OF 1940, MAKING FINDINGS,  
AND IMPOSING REMEDIAL SANCTIONS**

**I.**

The Securities and Exchange Commission (“Commission”) deems it appropriate and in the public interest that public administrative proceedings be, and hereby are, instituted pursuant to Section 15(b) of the Securities Exchange Act of 1934 (“Exchange Act”) and Section 203(f) of the Investment Advisers Act of 1940 (“Advisers Act”) against Christopher Booth Kennedy (“Kennedy” or “Respondent”).

**II.**

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the “Offer”) which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission’s jurisdiction over him and the subject matter of these proceedings and the findings contained in paragraph III.2 below, which are admitted, Respondent

consents to the entry of this Order Instituting Administrative Proceedings Pursuant To Section 15(b) of the Securities Exchange Act of 1934 and Section 203(f) of the Investment Advisers Act of 1940, Making Findings, and Imposing Remedial Sanctions (“Order”), as set forth below.

### III.

On the basis of this Order and Respondent’s Offer, the Commission finds that:

1. Kennedy was a registered representative at Western International Securities, Inc., a firm registered with the Commission as a broker-dealer and investment adviser, from August 2017 until July 2019 and from November 2019 until August 2021. Kennedy is 46 years old and resides in Simi Valley, California.

2. On January 10, 2024, a final judgment was entered by consent against Kennedy, permanently enjoining him from future violations of Section 17(a) of the Securities Act of 1933 (“Securities Act”) and Section 10(b) of the Exchange Act and Rules 10b-5 and 15c-1(a)(1) thereunder, as set forth in the judgment entered in the civil action entitled Securities and Exchange Commission v. Christopher Booth Kennedy, Civil Action Number 2:24-CV-10608 CAS (PDx), in the United States District Court for the Central District of California.

3. The Commission’s complaint alleged that Kennedy made false and misleading statements regarding the value and success of his trading strategy, and sent one customer falsified account statements. In addition, the complaint alleged that between July 2020 and July 2021, Kennedy recommended a short-term, high-volume investment strategy in nineteen retail customer brokerage accounts without a reasonable basis that exceeded \$363 million in total transactions, resulting in over \$9 million in customers losses. The nineteen retail customer brokerage accounts paid approximately \$1.277 million in total commissions, \$958,134 of which was paid to Kennedy. As a result of the high volume of recommended transactions and their attendant commissions, it would have been virtually impossible for these retail customers to achieve a positive return in their brokerage accounts.

### IV.

In view of the foregoing, the Commission deems it appropriate and in the public interest to impose the sanctions agreed to in Respondent Kennedy’s Offer.

Accordingly, it is hereby ORDERED pursuant to Section 15(b)(6) of the Exchange Act, and Section 203(f) of the Advisers Act, that Respondent Kennedy be, and hereby is barred from association with any broker, dealer, investment adviser, municipal securities dealer, municipal advisor, transfer agent, or nationally recognized statistical rating organization; and

Pursuant to Section 15(b)(6) of the Exchange Act Respondent Kennedy be, and hereby is barred 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.

Any application for reentry by the Respondent should be directed to the appropriate self-regulatory organization, or if there is none, to the Commission by contacting the Division of Enforcement's Office of Chief Counsel at [ENF-Reentry@sec.gov](mailto:ENF-Reentry@sec.gov) and will be subject to the applicable laws and regulations governing the reentry process, and reentry may be conditioned upon a number of factors, including, but not limited to, compliance with the Commission's order and payment of any or all of the following: (a) any disgorgement or civil penalties ordered by a Court against the Respondent in any action brought by the Commission; (b) any disgorgement amounts ordered against the Respondent for which the Commission waived payment; (c) any arbitration award related to the conduct that served as the basis for the Commission order; (d) any self-regulatory organization arbitration award to a customer, whether or not related to the conduct that served as the basis for the Commission order; and (e) any restitution order by a self-regulatory organization, whether or not related to the conduct that served as the basis for the Commission order.

By the Commission.

Vanessa A. Countryman  
Secretary