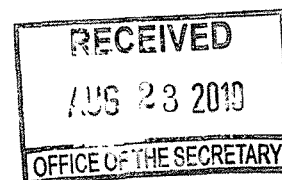


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UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-13871



In the Matter of

Ronald S Bloomfield
Robert Gorgia
Victor Labi
John Earl Martin, Sr.
And
Eugene Miller

Respondents,

MOTION FOR SUMMARY DISPOSITION

FOR

ROBERT GORGIA, RESPONDENT

Pursuant to Rule 250 of the Rules of Practice, Gorgia, acting *pro se*, hereby submits this Motion for Summary Disposition in the above matter before the Honorable Brenda Murray. The Order Instituting Proceedings ("OIP") dated April 27, 2010 states the violations in (1) Paragraph G, 54 as "failure to supervise Bloomfield, Labi, and Martin, within the meanings of Sections 15 (b) (4) and 15 (6) of the Exchange Act, with view of preventing and detecting their violations of Section 5 of the Securities Act". (2) Paragraph G, 55 as "willfully aided and abetted and cause violations of Sections 17 (a) of the Exchange Act and Rule 17a-8 thereunder".

This brief will demonstrate the Gorgia did not commit a violation of failing

to supervise Bloomfield, Martin. Labi or any other employee at Leeb Brokerage Services. First, applying the Commission's SEC "line" approach to determining supervisor status, we look at whether Gorgia was in the direct supervisory chain and had the ability to control the conducts of the individuals (see *In re* Louis R Trujillo , Exchange Act Release No 26,635, 1989 SEC Lexis 480, March 16,1989). Miller and Bloomfield were the supervisors, and Miller supervised Bloomfield. As reflected by the 2005 and 2006 Written Supervisory Procedures ("WSP"), Gene Miller was the supervisor for Penny and Microcap Securities. Gorgia was not a supervisor. Gorgia believes the 2006 WSP listing him as a supervisor was fabricated after the fact or submitted without Gorgia's knowledge. Anyone could have changed the internal section of the document. Second, Gorgia did not have the ability to control the individuals. Gorgia reported to Miller. The facts, as set forth in this Motion, reflect that even when Gorgia tried to assert control by pointing out problems, he was "dressed down" or forced to "tone" down his statements. Like so many in a job-and a part time at that- Gorgia made an effort over time but left the firm as it became apparent that he would not be listened to nor respected. The falsified WSP clearly indicate he was not in control.

This Motion will also demonstrate that Gorgia did not aid and abet violations of Section 17(a) and 17a-8. The elements of aiding and abetting require that (i) the accused had specific intent to facilitate the commission of a crime by another; (ii) the accused has the requisite intent, and (iii) the accused assisted or participated in the commission of the underlying offense. Gorgia could not be found to aid and abet when (1) Gorgia was not even present at the time of the commission; and (2) Gorgia did not

and could know of it, since other senior and experienced members of the firm withheld, did not inform or failed to perform their required duties.

TABLE OF CONTENTS

| | |
|--|----|
| INTRODUCTION | |
| LISTS OF EXHIBITS..... | ii |
| INDEX OF LEGAL AND AUTHORITATIVE REFERENCES..... | v |
| FACTUAL BACKGROUND | |
| I Background of Gorgia’s Association with Leeb Brokerage Services..... | 1 |
| II Compliance Nightmare | |
| A Financial..... | 2 |
| B Compliance and Personnel Issues..... | 4 |
| III Errors in the Documents presented to the SEC and the Testimony before the SEC..... | 6 |
| IV Supervisory Structure and Duties at LBS..... | 8 |
| V Duties Relating to AML Concerns and Penny Stock Transactions.. | 9 |
| VI Experienced Principals..... | 10 |
| VII Systematic Violations of the most basic Compliance Functions..... | 11 |
| VIII The “Tone” at the top of Managements and the Non Empowerment of Gorgia..... | 12 |
| IX Gorgia’s Continued Compliance after Resignation..... | 13 |
| X Continued Violations after Gorgia’s Departure..... | 13 |
| LEGAL ARGUMENT AND AUTHORITATIVE REFERENCES..... | 16 |
| CONCLUSION..... | 24 |

EXHIBITS FOR GORGIA' MOTION FOR SUMMARY DISPOSITION

| Exhibit Number | Description |
|----------------|---|
| 1-1..... | Historical Time Line |
| 1-2..... | Letter to Adam Grace and Attestation by Gorgia |
| 1-3..... | Gorgia's Employment Contract |
| 1-4..... | Eugene Miller's Deposition |
| 1-5..... | FINRA Exit Conference and subsequent emails |
| 1-6..... | Speech by Mary Ann Gadziala, SEC |
| 1-7..... | Global Trading Documents |
| 1-8..... | Broker Check for David Mack |
| 1-9..... | Promissory Notes for LCM |
| 1-10..... | Cost Sharing Agreement |
| 1-11..... | Corporate Resolution of LBS |
| 1-12..... | Letter to Robin Bifone, FINRA from Gorgia |
| 1-13..... | Memo for resolution of AR and AP between LBS and Affiliates |
| 1-14..... | Gorgia's report to Board of Directors of LBS |
| 1-15..... | Letter to Thompson Financial |
| 1-16..... | Emails from Gorgia to Robin Bifone, FINRA |
| 1-17..... | Emails from Gorgia to LBS Outside Accountants |
| 1-18..... | Memo to file for erroneous deposits to LBS checking account |
| 1-19..... | Employment Agreement for intended Red Bank Office |
| 1-20..... | Emails and memos concerning Compliance problems at LBS |
| 1-21..... | Emails with intended clearers |
| 1-22..... | Emails concerning employee behavior |
| 1-23..... | AML Audit Report 2005 |
| 1-24..... | Extracted calendar of Gorgia |
| 1-25..... | Summary of sign on to Quick Books |
| 1-26..... | Letter from Leeb to FINRA, Dec 24,2007 |
| 1-27..... | LBS WSP dated Mar 1,2005 |
| 1-28..... | Comparisons between 2005 and 2006 WSP for LBS |
| 1-29..... | Designation of Supervisors 2005 WSP and redacted pages of WSP with summarized spreadsheet |

EXHIBITS FOR GORGIA'S MOTION FOR SUMMARY DISPOSITION

| | |
|-----------|---|
| 1-30..... | Designation of Supervisors 2006 WSP and redacted pages of WSP with a summarized spreadsheet |
| 1-31..... | Email to Karen Hagan, Regulatory Compliance |
| 1-32..... | Bloomfield's Deposition |
| 1-33..... | American Express Statement |
| 1-34..... | Letter from David Mack to FINRA, dated Mar 4,2005 |
| 1-35..... | Letter from Gorgia to FINRA dated Apr 2,2005 |
| 1-36..... | Extract of OSJ WSP |
| 1-37..... | OSJ MOU |
| 1-38..... | LBS WSP dated Mar 1,2005 Section 19.0 |
| 1-39..... | FINCEN Guidance of SAR Narrative |
| 1-40..... | Wires to Lichtenstein |
| 1-41..... | Pershing Wires for the OSJ |
| 1-42..... | Pershing Wires Summation |
| 1-43..... | Poss' Deposition |
| 1-44..... | Personnel's emails and comments by brokers |
| 1-45..... | Memo concerning Shareholder Meetings |
| 1-46..... | Emails concerning OSJ violative actions |
| 1-47..... | Gorgia's Notification to respective parties after his resignation |
| 1-48..... | AML Audit Report 2006 |
| 1-49..... | Legent Wires |
| 1-50..... | Legent Trades |
| 2-1..... | Stock Trades for Lifeline Biotech |
| 2-2..... | Floor Plan |
| 2-3..... | Labi Deposition |
| 2-4..... | Letter to David Stocker |
| 2-5..... | Emails and Correspondence with Pershing and the SEC regarding "Yafa" |
| 2-6..... | Emails with Jack Horner, Member of the Board of Directos |
| 2-7..... | Emails for Board of Director Meeting |
| 2-8..... | SIA White Paper |
| 2-9..... | Speech by Gene Gohlke,SEC |
| 2-10..... | Federal Register Vol 68 No 247 page 74720 |
| 2-11..... | Speech by Cynthia Glassman, SEC |
| 2-12..... | Anthony Parraglia Paper |

EXHIBITS FOR GORGIA'S MOTION FOR SUMMARY DISPOSITION

2-13..... Gorgia's December 2005 Resignation

INDEX OF LEGAL STATUTES AND AUTHORITATIVE REFERENCES

Statutes

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- *In re* James Huff, Exchange Act Release No 29,017, 48 S.E.C. Docket 767
- *In re* Louis R Trujillo , Exchange Act Release No 26,635, 1989 SEC Lexis 480, March 16,1989
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- United States v Roan Eagle, 867 F. 2d 346,455 (8th Cir), *cert denied* 490 U.S. 1028 (1989)

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FACTUAL BACKGROUND

I. Background of Gorgia's Association with Leeb Brokerage Services

In order to determine the facts and circumstances in this particular case, it is necessary to be informed of Gorgia's association with Leeb Brokerage Services ("LBS"). The historical "time line" has been previously submitted to the SEC and re-submitted herein as **Exhibit 1-1**.¹ Gorgia was originally hired as a Part time Financial and Operations Principal ("FINOP").² The timeline shows the inordinate amount of an increasing workload that was not disclosed upon Gorgia accepting the position as a part time FINOP.

The "compliance nightmare" (as stated in paragraph 40 of the OIP) was not limited to penny stocks. It predated Gorgia from the first day of transition (training) in December 2004 until his resignation on June 15, 2006. Eugene Miller ("Miller"), respondent in this matter, testified that "he (Miller) tried to get control of the New York Office" (Miller Tr. page 20 at 1-4) (**Exhibit 1-4**). In order to get the finances in order, Miller wanted his "own" FINOP. This is best exemplified in the NASD (FINRA) examination between November 2005 and February 2006, and LBS' response (and continued through emails through Mar 8, 2006) (**Exhibit 1-5**). The results reflect the numerable violations that preceded Gorgia and the ones Gorgia could not address.

¹ The numeration in this **Exhibit 1-1** and others in script has been added by Gorgia in preparation of Exhibits for Submission in this matter. This document among others was submitted either at the Deposition of Gorgia on December 19, 2007 or subsequently to Mr. Adam Grace, NY SEC Staff Attorney. (**Exhibit 1-2**)

² See **Exhibit 1-3**.

In her speech to the Compliance Conference on May 16, 2006, Associate Director Mary Ann Gadziala listed some (10) of the core functions of compliance and some (14) subject areas.³ A part time FINOP was not and could not be expected to see into every corner of the operations of LBS. But when violations, potential violations and non compliance with the WSP were discovered, Gorgia made efforts to address them, but clearly lacked the supervisory empowerment or control.

II The Compliance Nightmare

A. Financial

The following reflects a small compilation of the demands Gorgia made on himself in complying with the Rules and Regulations of the SEC Net Capital Requirements and the Books and Records, to ensure that LBS' books and actions were in compliance, considering that which existed before his employment. And that such actions consumed an inordinate amount of Gorgia's limited time.

1. **Exhibit 1-7** represents the documents Gorgia had to prepare in December 2004, while being introduced to LBS' organization. The extension of a loan to a Global Trading LLC represented by David Mack, Compliance Consultant to LBS until March 2005, and again as Chief Compliance Officer ("CCO") from April –Jul 2007⁴ and Victor Labi ("Labi") (Respondent in this Matter). In order to be compliant with the duties

³ Gadziala, Mary Ann, "Comprehensive Examinations for Securities Firms, May 16, 2006 at 4-5 (**Exhibit 1-6**).

⁴ See **Exhibit 1-8**

and obligations concerning Financial Books and Records, Gorgia documented a transaction which took place in Nov 2004 before he started.

2. **Exhibit 1-9** represents documentation Gorgia had to prepare for affiliate loans.

3. **Exhibit 1-10** represents Gorgia executing documentation for a situation that existed previously, the absence of which was a violation of SEC Rules.

4. **Exhibit 1-11** is another document memorializing the transition to Gorgia as Chief Financial Officer ("CFO"). Included in that is the removal of Steven [sic] Leeb ("Leeb") as a signatory to the bank accounts. Leeb was precluded by FINRA from any managerial control of any broker dealer in the day to day operations. Such a previous existing condition is in direct defiance of a FINRA directive.

5. **Exhibit 1-12** is a letter to Robin Bifone, FINRA, dated March 2, 2005 relaying some of the many booking and reporting problems at LBS, which Gorgia was working on to correct.

6. **Exhibit 1-13** is Memo to file and Miller from Gorgia, showing the inordinate amount of influence and control over LBS by non regulated affiliated entities (controlled by Leeb) and their (unregistered) personnel especially concerning the finances of LBS. This provided the premise for **Exhibit 1-14** page 2-3.

7. **Exhibit 1-15** is a letter from Gorgia to Thompson Financial addressing (one of) vendor problems experienced at LBS with emails continuing to Mar 2006.

8. **Exhibit 1-16** is 2 emails from Gorgia to Robin Bifone of FINRA, continuing Gorgia's constant communications with the Financial Department of FINRA to maintain accuracy and compliance, and keeping them informed of all major developments that

would have affected previous financial filings. Of note is the statement "I think the nightmare I inherited is pretty much cleared up" in the first email.

9. **Exhibit 1-17** is an email sent to LBS' Outside Accountants from Gorgia, on vacation, continually attempting to be compliant for all the aspects of LBS' books and records.

10. **Exhibit 1-18** is an Memo to File from Gorgia dated April 17,2006, which displays continual (seemingly minor) areas and events to be addressed and documented.

11. **Exhibit 1-19** is another example, although not purely financial, that Gorgia addressed.

B. Compliance and Personnel Issues

The following represents a sampling of further demands on the limited time Gorgia had while at LBS and what he considered to be part of the "Compliance nightmare" in addition to the trade problems and regulatory inquiries. Gorgia attended to all the matters that arose in attempting to assiduously address the areas of Finance and Compliance to observe the Rules and Regulations of FINRA and the SEC.

12. **Exhibit 1-20** is a sampling of emails (in chronological order) and memos addressing such mundane and seemingly simplistic issues which escalated into the need for a *dicta* from the CCO. Such as (a) enforcing personnel's compliance with account documentation; (b)trade corrections; (c) violations of LBS' Membership Agreement with FINRA; (d) attempted "parking" of licenses; (e) demanding compliance with the Firm's Continuing Education ; (f) Selling Away Agreements; (g) getting the

OSJ on the server; (h) questions from former “no shows” on why Gorgia U-5ed him (the process required to remove registered representatives from the roster); (i) preparing for OATS III; (j) attempts by affiliate employees to park licenses;(k) 605 compliance (formerly 11Ac-1-5); (l) further explanations and flow charts for an intended bond business; (m) reactions for “erroneous employment to renew licenses”.

13. Exhibit 1-21 reflects the negotiations with intended clearers such as Legent, Prudential, Citibank and the need to complete their documentation and schedule meetings; negotiations with benefits specialists to curtail health costs.

14. Exhibit 1-22 reflects the escalation of certain employees interfering with broker’s attempts to seek other employment; unauthorized viewing of emails; rumors, innuendos and misrepresentations about former employees brought to the attention of the CCO in writing from outside sources.

15. Exhibit 1-23 is the written AML Audit Report for 2005. Of note is that it was not until July 25, 2005 that Gorgia could address the need for the audit report. There was no 2004 report (as required) and FINRA cited LBS in their Exit Interview for exactly that reason (**Ex 1-5** p. 26-4, number 18).

16. Fundamentally Gorgia was part time and often operated off site. **Exhibit 1-24** is an extract of Gorgia’s calendar (as submitted to SEC) which is a sampling of Gorgia’s schedule both off site and during business hours both at LBS and Gorgia’s other Broker/Dealer affiliation with McFadden Farrell Smith (“MFS”). This reflects the times Gorgia was not at LBS, all of which was known by LBS before Gorgia was hired.

17. **Exhibit 1-25** is a summary of the documented times signed onto the accounting software program for LBS by Gorgia to record entries into the program. The summary exemplifies the non-routine bifurcated schedule of Gorgia.⁵

III. Errors in the Documents presented to the SEC and the Testimony before the SEC

The documents presented to the SEC during its investigations, and subsequently to Gorgia in discovery contain factually incorrect entries and contradictions within the documents. It also reflects the other defendants' attempt to shift blame and responsibility to Gorgia

18. **Exhibit 1-26** is documents submitted to the SEC by LBS on Dec 24, 2007. The letter states that Gorgia was CCO and AML Officer from March 2005 to Nov 2006. Gorgia resigned June 15, 2006.

19. **Exhibit 1-27** is a part of the submission (**Ex 1-25**) mentioned above. This is entitled "LBS Supervisory Procedures". In script it shows that these were in place from March 1, 2005 until Nov 2006. In the second to last paragraph on page 1/98, it shows Gorgia as CCO. Gorgia resigned June 15, 2006, so this is inaccurate.

20. **Exhibit 1-28** is a spreadsheet prepared by Gorgia reflecting the inherent contradictions between the LBS 2005 Written Supervisory Procedures ("WSP") (**Exhibit 1-29**) and the 2006 WSP (**Exhibit 1-30**). The summations (pages 17-18 in the 2005 WSP (**Ex 1-29**) and pages 18-20 in the 2006 WSP (**Ex 1-30**) are the specific identifications of the supervisors. Augmenting that further is the Registered

⁵ This extract is taken from the contemporaneous Audit Trail of Quick Books and was submitted to the SEC (see **Ex 1-2**). The actual document is 580 pages.

Representative Assignment on pages 266-267 in the 2005 WSP (**Ex 1-29**) and page 249 in the 2006 WSP (**Ex 1-30**). Throughout the specific areas of the firm's operations in the 2006 WSP (**Ex 1-30**), the entries are in complete contradiction to the summations on pages 18-20 and 266-267 of the WSP. Further **Ex 1-28** summarizes that, in 2005, Miller was named Home Office Supervisor ("HOS") 42 times, and Trade Desk Supervisor ("TDS") 17 times. Gorgia was not named at all in 2005. In 2006, Miller was named twice as HOS and TDS. In the 2006 WSP, still as a part time employee, Gorgia is allegedly designated (in the specific areas of the WSP, not the summation or Registered Representative Supervisor (pages 266-267) (**Ex 1-30**)) 42 times as HOS and 17 times as TDS. It is incomprehensible and an impossibility that Gorgia could perform the functions (were the court to believe the entries) of FINOP, CCO, Home Office Supervisor and Trade Desk Supervisor on a part time basis.

21. Miller stated in his deposition that he was the TDS (Miller Tr, pages 10-11 at 25 and 1) (**Ex. 1-4**).

22. The WSP has a date of June 2006 and Gorgia resigned on June 15, 2006); why Gorgia's name remains listed after he left suggests the attempt by others to shift the responsibility through a false submitted document. LBS made no attempt to correctly reflect their structure. Such actions are in contravention to FINRA and SEC Rules and Regulations.

23. **Exhibit 1-31** is an email Gorgia sent to Regulatory Compliance (formerly Broker Dealer Compliance), a vendor that produces Compliance Manuals, on June 15, 2010, and the response of which is included. The response to Gorgia's question 3 is "there are no automatic provisions. The documents are in Word and can be changed

at will". The original WSP that Gorgia prepared in June 2006 did not contain the assignments Gorgia is allegedly to have held. Between Gorgia's departure and the submission to the SEC in 2007, the WSP was altered (see pages 18-19 of **Ex 1-30**).

24. Before his testimony to the SEC, Ronald Bloomfield ("Bloomfield") emphatically stated that Gorgia never came to the Santa Monica Office (Bloomfield Tr, page 139 at 24) (**Exhibit 1-32**). Yet however, **Exhibit 1-33** in fact shows that Gorgia was indeed in Santa Monica Aug 9-18, 2005, shortly after the OSJ was approved by FINRA.

IV. The Supervisory Structure and Duties at LBS

The OIP is in error stating that Gorgia was a supervisor. Gorgia was the AML Officer, but at no time was Gorgia a supervisor of any person or any office.

25. **Exhibit 1-34** is a Letter to Sean Wasseem (FINRA) from Mack dated Mar 4, 2005 which states in Standard 1, 1(c) that Gorgia would be the supervisor for Bloomfield. It is erroneous. Mack was not authorized to make any statements to any Regulatory Body or anyone else committing LBS or making binding statements, without approval. **Ex 1-8** reflects that Mack was U5ed in Jan 2005. As indicated in **Exhibit 1-35**, Gorgia was contacting FINRA on matters concerning the Office of Supervisory Jurisdiction ("OSJ").

26. **Exhibit 1-36** is part of the OSJ Manual for LBS. On page 37 and throughout the entire manual, there is no mention of Gorgia being a Supervisor of the OSJ. Indeed, on the designation of supervisors (page 37), it is obvious that Miller, as President and CEO on the first line would be the direct supervisor of the OSJ.

27. **Exhibit 1-37** is the Memorandum of Understanding (“MOU”) between LBS and the OSJ dated July 21, 2005. The MOU in Clause 1, “Superiority of LBS “Home Office””, is explicit. Based on **Ex 1-28-1-30** where Miller is listed 42 times as HOS in 2005, and considering the alleged alterations, was still HOS in 2006, conclusively Miller as CEO, HOS and TDS was indeed the direct supervisor of Bloomfield during Gorgia’s employment at LBS.

V. Duties Relating to AML Concerns and Penny Stock Transactions

28. Since the OIP references and is predicated on AML Rules and Penny Stock Transactions, the following represent the written duties of supervisors:

28.1 **Ex 1-29** spreadsheet is a brief but very concise explanation (fully documented in the Exhibit) of the duties of Miller. He was to monitor trades daily (Row 28); he was to review the transmittal of funds daily and initial logs (Rows 39 and 40); he was to approve orders for more than 10,000 shares (Row 33); he was to review market conditions and order tickets (Row 59); he was to review cash and foreign transactions (Row 77); he was to review records of wire transfers and foreign transfers (Row 93) (emphasis added).

28.2 In designating Bloomfield as the supervisor for AML for the OSJ (**Ex 1-36**, page 37 and restating it on page 288), part of his duties were to notice “numerous currency and cashiers check transactions aggregating to significant sums” (page 296); notice if “the customer’s account has wire transfers that have no apparent business purpose to or from a country identified as a money laundering risk or a bank secrecy haven” (page 297); or if “the customer engages in excessive

journals between unrelated accounts with any apparent business purpose" (page 297).

28.3 Exhibit 1-38 A LBS WSP dated 03/2005 and submitted to the SEC, at page 96/98 states the information needed for transmittal of funds and securities and the person to ascertain and verify the information. In addition, as stated in **Ex 1-26** at (marked) page 19-20, the procedure for suspicious activity flows from the registered representative, to the Principal (Supervisor), who then performs a

"sanity check". "And then at this stage, if the designated Principal can confidently dispel the suspicion, notes on the dismissed event should be added to the customer's file, for future reference. Should the suspicion prove valid, the employee and the designated Principal together must complete a Preliminary Suspicious Activity Report. The designated Principal must forward the PSAR to [sic] ML Supervisor for review".

The policy and procedures were (and continued to be) in place throughout the relevant period. Bloomfield, as the OSJ Principal, and OSJ AML Compliance, with Miller as his supervisor and TDS and HOS did perform the actions mentioned above and never filed a PSAR.

Financial Crimes Enforcement Network ("FINCEN") requires a narrative when filing a SAR (**Exhibit 1-39**). If the "sanity check" dispelled the suspicion, then a narrative could not be completed in the absence of a PSAR completed by the principals and supervisors.

VI Experienced Principals

At LBS, Gorgia dealt with experienced, seasoned and knowledgeable principals. Gorgia reported to Miller, and Bloomfield reported to Miller. Both Miller and Bloomfield were “line supervisors” and performed administrative duties as well. Both were on site, and full time.

29. Miller had been AML Officer for LBS (Ex 1-26, page 1); Miller oversaw day to day AML Compliance (Ex 1-23, page 2); Miller reviewed trade tickets on a daily basis (Ex 1-23, page 4).

30. Miller testified he reviewed trading activity reports [Ex 1-4] (Tr 20 at 16-18 and 152 at 10-11); did some AML (Tr 83 at 9-10); was on the front lines keeping his eyes and ears open (Tr 92 at 5-6);

31. Bloomfield was listed as the OSJ AML Supervisor (Ex 1-36 pages 37).

32. Bloomfield testified that he reviewed trading activity [Ex 1-32] (Tr. 11 at 1-2 and 13 at 10-12); considered himself the first line defense in AML matters (Tr. 49 at 1-6); was to report to Compliance on any AML flags (Tr 113 at 4-8).

VII. Systematic Violations of the most basic Compliance Functions

33. One of the basic functions of “line supervisors”, and TDS supervisors, as mandated in the WSP is the acknowledgement of wires transfers ((Ex 1-29, page 44, and 247) (Ex 1-36, page 130, 296-297)) and daily trading activity. Yet on the most basic level, neither Miller nor Bloomfield came remotely close to such rudimentary operational function. Exhibit 1-40 reflects the violation of the desk supervisors failing to simply initial outgoing wires to a destination such as a foreign tax haven, as was

required by the WSP pertaining to wire transfers and currency transfers. Replete in the documented requests, is direct circumvention in many cases of the NY Office and Gorgia by the OSJ, and the mere pass through of the wire requests. Tellingly, neither Bloomfield's nor Miller's initials appear on the wire request, as required.

34. Exhibit 1-41 are the extracted wire transfers from Pershing as submitted to SEC for the ARC account (which was the designation for the OSJ accounts). Of the 350 wires sent Jan-Jul 2006, 349 were processed by Miller (Col F, noted P57RGM12). One was sent by Lana Gayevskaya ("Lana") (Operations Manager for LBS and a Member of the Board of Directors) (Col F noted P57RLGAY).

35. Exhibit 1-42 is an extracted summary of all other wires transmitted at Pershing during the Jan-Jul 2006. Of the processed and accepted wires, 349 were by Miller; 307 were by Lana, and the majority of the balance was a combination of other persons on the desk.

VIII The "Tone" at the Top of Management and the Non Empowerment of Gorgia

36. In Gorgia's deposition he commented that Miller was "weak at best". Supporting that was Thomas Poss' ("Poss") testimony "Gene was a passive CEO, not active...he would always make deals with employees to make them happy" (**Exhibit 1-43**) (Poss Tr. 273-274 at 21-25, 1-2). **Exhibit 1-44** reflects employee dissatisfaction with the (lack of) leadership on the desk.

37. Further exacerbating that was that Leeb would often interject and dictate what was to be followed (as reflected in **Ex 1-20**). On March 22, 2005, Gorgia was

admonished for suggesting at a shareholder meeting that full distribution of the (erroneous) previous 2004 profits would place the firm in Net Capital Violations (**Exhibit 1-45**). On April 28, 2005, Gorgia was “dressed down” by Leeb for challenging a 95% payout to a Christopher Arts, an Investment Banker for LBS.

38. Exhibit 1-46 is a series of emails concerning an incident with the OSJ. Gorgia took information concerning accounts at Pershing and took affirmative and forceful action with the OSJ Principal and AML Supervisor (with a cc to Miller and Lana, two members of the Board of Directors). Gorgia was subsequently forced to “tone down”, retract his statements by the CEO, HOS and TDS.

IX Gorgia’s Continued Compliance after Resignation

39. Exhibit 1-47 is the official notification to respective parties of Gorgia’s resignation. In addition to providing LBS with a “punch list” of open items (paginated 34-4), Gorgia notified the respective Regulatory Bodies, and the banks. Further **Exhibit 1-48** shows that Gorgia had another AML Audit performed for two reasons. (1) it was approaching the annual requirement and (2) to provide Poss with an audit result during his orientation and facilitate his transition.

X Continued Violations after Gorgia’s departure

40. The conduct and manner of operations as mentioned above continued after Gorgia’s departure. Poss, LBS’ CCO and CFO after Gorgia testified that he experienced similar situations as Gorgia. “Gene reviewed pretty much everything that went on every day” [**Ex 1-44**] (Tr. Page 47 at 8-10). He (Poss) also “wasn’t told

anything” (Tr page 185 at 17-20), nor did he receive everything, “I don’t know that I received everything” (Tr page 212 at 16-19).

41. Poss himself relied on the experienced principals for trade reviews. He stated that “Ron was doing it (trading activity). And, Lana was doing it. And I believe Gene was doing it” (Tr page 238 at 4-6).

42. Exhibit 1-49 is an extract of the Legent wires sent between 6/2/2006 and 2/17/2006. The majority of the 537 wires are for the OSJ account and there is no indication of approval for the wires.

43. Exhibit 1-50 is an extracted summary of trades while LBS was at Legent Clearing Firm (“Legent”)⁶. The number of securities traded is 464. This volume of trading can only be reviewed on a real time basis with the line supervisors.

44. Exhibit 2-1 reflects an extracted summation of the trades in Lifeline Biotechnologies Sept 2006-Mar 2007 in a total of 1.010 billion shares. The OIP in paragraphs 29 and 30 make this allegation by inference of Gorgia.

44. The OIP has stated that the relevant range was from April 2005 through mid 2007 (OIP paragraph 7). Because of the systematic disregard for proper procedures, and the reliance on professional experienced principals, neither Gorgia (part time) nor Poss (full time) were enabled or empowered to view trading on a real time basis or make comparisons to the events (trading activity) in the market in any one particular equity.

Further the policy and procedures emphatically state that the Registered Representatives are the first layer of compliance; the TDS’ review in real time,

⁶ The entire spreadsheet of subtotals is over 8,200 rows

account opening documents, transfers into and out of the account, trading activity, comparative analysis with market conditions, and review of the brokers' activity.

Exhibit 2-2 is a floor plan of the LBS Trading Room as known by Gorgia through April 2006. The turnover was culminating around that time so the floor plan is not up to Gorgia's departure. This reflects the close proximity of the brokers and the TDS and the Operations. With the passive attitude for compliance by the brokers, it became necessary that the Compliance Officer address the rudimentary task of demanding certain documents from the brokers. Yet the operation was contained in a small area with direct oversight by the CEO.

LEGAL STATUTES AND AUTHORITATIVE SOURCES

I Failure to Supervise

45. The litmus test to determine Gorgia's role has been stated in previous legal proceedings before the Commission.:

“Traditionally, the Commission has used the ‘line’ approach to determine supervisory status.⁷ *In re Arthur James Huff*, the Commission considered whether the alleged supervisor was in the same supervisory structure as the violator.⁸ In other words the Commission determined whether the individual was in the violator’s direct supervisory chain in the hierarchical scheme of the firm.⁹ Two commissioners in *Huff* proposed an expanded definition of supervision in a concurring opinion.¹⁰ The concurrence stated that the ability to control the conduct of the other individual was the most important consideration in determining who a supervisor was under §15(b)(4)¹¹. Without the requisite control, the concurrence argued, supervision would not exist”¹²

“The Division asserted that Trujillo had failed to adequately Supervise Matl, as required under §§ 15(b)(4)(E) and 15(b)(6) of Exchange Act. In reviewing the compliant, the

⁷ See *In re George J. Kolar*, Initial Decisions Release No 152, 70 S.E.C. Docket 2382, at 28 (Oct 28, 1999)(citing *Huff*, 48 S.E.C. Docket 767 at 7).

⁸ *In re Arthur James Huff*, Exchange Act Release No 29,017, 48 S.E.C. Docket 767 at 7.

⁹ *Id*

¹⁰ *Id*

¹¹ *Id* (stating that “In our view. The most probative factor that would indicate whether a person is responsible for the actions of another is whether the person has the power to control the other’s conduct”)

¹² *Id*

Commission analyzed Trujillo's actions, or more accurately, inaction, 'under all the circumstances'. The Commission considered the alleged violations of Matl, the structure of the office, and the power vested in Trujillo. The Commission restricted its investigation to the information and circumstances available to Trujillo at the time of the violation.¹³ Information and circumstances viewed in hindsight must not affect the analysis¹⁴ In finding Trujillo not guilty of failing to supervise Matl, the commission emphasized Trujillo's lack of disciplinary power. Trujillo was an administrative manager in Merrill Lynch's San Francisco office and directly supervised Matl.¹⁵ However, Trujillo reported to a supervisor himself.¹⁶ The Commission, in looking at all attendant circumstances, realized that Trujillo was constrained by his position and did not act unreasonably.^{17/18} (emphasis added)

46. It has been demonstrated that Gorgia was not able to control, lacked disciplinary powers, was not a direct supervisor, and was constrained.

47. The SEC allegations that Gorgia "failed to supervise" (although refuted in this Motion) or that Gorgia was "negligent" in his duties are erroneous. Given the limited time and the (lack of) empowerment, Gorgia performed his duties and obligations in good faith and in an unprejudiced manner. In the attempt to comply with the entirety of FINRA Rules and Regulations, and with the Securities and Exchange Acts Laws, Gorgia acted in good faith and addressed the matters as they

¹³ *In re* Louis R Trujillo, Exchange Act Release No 26,635, 1989 SEC LEXIS 480 at 10 (Mar 16,1989).

¹⁴ *In re* Dean Reynolds, Inc. Initial Decisions Release No 179, 74 S.E.C. Docket 522 at 49 (Jan 22,2001)

¹⁵ *Trujillo*,1989 SEC Lexis 480 at 9

¹⁶ *Id* at 11 (describing Trujillo's functions as "largely advisory")

¹⁷ *Id* at 4

¹⁸ Pirraglia, Anthony, "A Tangled Web: Compliance Director Liability Under Securities Laws, Fordham Journal of Corporate & Financial Law, Vol III, 2003 at 252-253

required or arose. The CEO, Miller stated that Gorgia “responded to the issues” (**Ex 1-4**) (Miller Tr page 39 line24-25, page 40 line 1). Labi testified that Gorgia was very concerned about AML (**Exhibit 2-3**) (Labi Tr. page 20, lines 17-20).

48. When situations arose, and with permission, Gorgia took affirmative steps to correct the situation. **Exhibits 2-4**, the closing of accounts for suspicious activity, and **Exhibit 2-5**, the interaction with Pershing and the SEC.

Further as required, Gorgia reported the CEO, Miller, and the BOD formally (**Ex 1-13**) and informally¹⁹.

“If Compliance Department personnel perceive a supervisor’s response to be insufficient, Compliance Department personnel should follow a defined process for escalating issues to senior Compliance personnel, business line and senior management and/or the Board of Directors”²⁰

Indeed, Gorgia reported to Miller (**Ex 1-4**)(Miller Tr page 66, lines 19-25), Gorgia frequently spoke with Miller (Miller Tr page 70, lines 13-18) . Opposite Miller sat Lana, Operations Manager (Miller Tr page 34, line 10-11). Miller was CEO and a Member of the BOD; Lana was a Member of the Board of Directors (**Ex 1-13**). Gorgia is now communicating with the CEO and 50% of the Board of Directors.

Gorgia did not have the empowerment to enforce compliance with the most basic requirements of the WSP, or operational procedures.

49. Miller was described as “weak at best” (paragraph 40 of the OIP) and “passive” (**Ex 1-43**) (Poss Tr. page 273, lines 21-25). With the “Management at the

¹⁹ See **Exhibits 2-6 and 2-7**

²⁰ Securities Industry Association, “White Paper on the Role of Compliance”, October 2005, page 5, **Exhibit 2-8**.

Top” in a non confrontational and inactive mode, Gorgia was neutralized of corrective actions and of performing the duties and obligations as alleged by the SEC. Indeed one of the basic requirements for fulfilling the duties of CCO, empowerment, were negated directly or indirectly by the CEO and the Board of Directors.

“..the CCO is still expected to be ‘empowered’”²¹

“Employees of brokerage firms who have legal or compliance do not become ‘supervisors’ for purposes of Sections 15(b) (4) (E) and 15(b)(6) solely because they occupy those positions. Rather determining if a particular is a ‘supervisor’ depends on whether under the facts and circumstances of a particular case, that person has requisite degree of responsibility, ability or authority to affect the conduct of the employee whose behavior is at issue. [FN24]²².

“..that appropriate action to respond to the misconduct. For example such a person could direct or monitor an investigation of the conduct at issue, make appropriate recommendations for limiting the activities of the employee or for the institution of appropriate procedures reasonably designed to prevent and detect future misconduct, and verify that his or her recommendations, or acceptable alternatives, are implemented. If such a person takes appropriate steps but management fails to act and that person knows or has reason to know of that failure, he or she could consider what additional steps are appropriate to address the matter. These steps include disclosure of the matter

²¹ Gohlke, Gene, Associate Director of Compliance Inspection and Examinations, U.S. Securities and Exchange Commission, Speech by SEC Staff: “Managed Funds Association Educational Seminar Series 2005: Practical Guidance for Hedge Fund CCO Under the SEC New Regulatory Framework”, “A Job Description for CCOs of Advisors to Private Investment Funds, May 5, 2005, page 5(Ex 2-9).

²² Exchange Act Release No 34-31554, In the Matter of John H Gutfreund, Thomas Strauss, and John Meriweather, Administrative Proceeding File No 3-7930,(December 3, 1992). FN 24 Although it did not represent an Opinion of the Commission, the concurring opinion in Arthur James Huff, Exchange Act Release No. 29017 (March 28, 1991), is consistent with this principle. The operative portion of that opinion, Part VI, explains that in each situation a person’s actual responsibilities and authority, rather than, for example, his or her “line” or “non-line” status, will determine whether he or she is a “supervisor” for purposes of Sections 15(b)(4)(E) and (6).

to the entity's board of directors, resignation from the firm, or disclosure to regulatory authorities."^{23/24}

"In the Adopting Release, the Commission said that an Adviser's CCO should be empowered with full responsibility and authority to develop and enforce appropriate policies and procedures for the firm. It seems logical, then to conclude that the Compliance Officer should have a position of sufficient seniority and authority within the organization to be able to compel others to adhere to the firm's compliance policies and procedures."²⁵ (emphasis added")

"Thus, the compliance officer should have a position of sufficient seniority and authority within the organization to compel others to adhere to the compliance policies and procedures"²⁶ (emphasis added)

"IM-3013 provides that the responsibility for discharging compliance policies and written supervisory procedures rest with the firm's business line supervisors"²⁷

"For a Compliance Department officer to be liable for deficient Supervision, the employee who violates a securities law must be 'subject to the supervision' of the individual. Exchange Act §15(b)(4)(E)"²⁸

"These enforcement actions arise only when the Compliance Department personnel have been specifically delegated, or have assumed supervisory authority for a particular business activity or situations, and therefore, have 'the requisite degree of responsibility ability or authority to affect the conduct of the employee whose

²³ Id

²⁴ See **Exhibit 2-13**, Gorgia's attempted resignation in Dec 2005 remaining under what materialized as misrepresentations and finally in June 15,2006.

²⁵ Gohlke, op cit at page 5 **Ex 2-9**

²⁶ Federal Register Vol 68 No 247/ Wednesday December 24,2003/ Rules and Regulations SEC Final Rule: Compliance Programs of Investment Companies and Investment Advisers 17 CFR Parts 270,275 and 279 [Release Nos IA-2204; IC-26299; File No S7-03-03] effective date February 5,2004, page 74720 **Exhibit 2-10**

²⁷ SIA , op cit, page 11 **Ex 2-8**

²⁸ Id, page 11

behavior is at issue”²⁹

50. The SEC has testimony from Bloomfield and Miller that they were the line supervisors (Ex 1-32) (Bloomfield Tr, page 48. Line 6-8;page 49, line3-6; (Ex 1-4)Miller Tr page 92, lines 5-6). Further attesting to the lack of empowerment and the ability to control the activities of the personnel at Leeb Brokerage Services, is Gorgia was compelled to apologize for a reprimand to Bloomfield, as documented in Ex 1-46 The matter was before the CEO and a Member of the Board of Directors, and Gorgia was completely overridden.

Gorgia was part-time (as acknowledged and attested to by Miller). Gorgia had constraints to that which he could attend to (considering the other responsibilities and obligations inherent in the position of CFO and CCO).

“..there are several characteristics that I would want the corporate responsibility officer to have if I were relying on that person: He or she should have sufficient seniority and authority to take actions necessary under the circumstances. The position should have the full support of the CEO and senior management, both in theory and practice. In addition, the responsible officer should have sufficient time and adequate resources to implement the company’s corporate responsibility program in an effective matter.”³⁰ (emphasis added)

Gorgia could not, even if he wanted to, monitor trading and activities in real time since he was not physically present,

“Business supervisors should make the final decisions as to transactions, given that they are likely to have more information and to be more familiar with particular situations, and ultimately, are responsible for such matters.”³¹

²⁹ Id, at page 11-12

³⁰ Glassman, Cynthia, “US SEC Speech by SEC Commissioner: Sarbanes-Oxley and the Idea of “Good Governance”, September 27, 2002. (Exhibit 2-11)

2- "Aiding and Abetting"

The allegation of "willfully aiding and abetting", because of the allegation of "failure to supervise" is erroneous.

51. The 2005 WSP (Ex 1-29), at page 17 list the supervisor for "Penny Stocks" as Gene Miller. The 2006 WSP (Ex 1-30) at page 19 list Miller as the supervisor for "Penny Stocks/Microcap Securities". Miller, stated in his deposition (Ex 1-4 page 10 lines 1), he was trade desk supervisor. He supervised the desk the reps. "I had the 24's reporting to me" (Miller Tr page 31 lines 11-12). Miller reviewed new account documentation and trading activity (Miller Tr 31 lines 19-23).

52. Gorgia has testified, and Miller has affirmed that Gorgia was part time and only on site either in the morning or the afternoons (Ex 1-4) (Miller Tr page 36 lines 4-25).

53. The allegation of aiding and abetting lacks the sufficient legal basis and foundation. As noted in S.E.C. v Kenneth Pasternak and John P. Leighton, 561 Supp 2d (June 24, 2008) the requirements to sustain such a claim are not present in this matter.

"In addition to actual knowledge, the SEC must also show that the aider-abettor substantially assisted in the underlying fraud. To establish 'substantial assistance', a court may look to various factors to determine.. Those factors include '(1) the amount of assistance given by the defendant;(2) the defendant's presence or absence at the time of the tort; (3) the defendant's relation to the other person; and the defendant's

³¹ Securities Industry Association, op. cit, page 3 (Ex 2-8).

state of mind”³² (emphasis added)(citations omitted).

54. In this matter, Gorgia could not be present when the allegations contained in OIP took place; Gorgia did not lend “substantial assistance” and did not have the “state of mind”. Bloomfield testified before the SEC, that he reported no suspicious activity to Gorgia (**Ex 1-32**) (Bloomfield Tr. page 113, lines 15-22). Further Gorgia took positive steps when matters arose demanding his attention (**Ex 1-4**)(Miller Tr. Page 117 lines 14-25 and Page 118 lines 1-21). Further Gorgia took positive actions to prevent not assist, when informed or discovered potential violative actions.

55. Assuming *arguendo* that Gorgia failed to act in capacity as CCO, the courts have stated that:

“(Inaction on the part of the aider and abettor is not sufficient to satisfy the substantial assistance prong of the standard unless it was designed to intentionally to aid the primary fraud or it was conscious or reckless violation of a duty to act’. (internal quotations marks omitted)). Similarly, the United States Court of Appeals for the Second Circuit has held that aiding and abetting liability requires a showing of the defendant’s substantial assistance proximately caused the primary violation.”³³ (citations omitted) (emphasis added).

“a Plaintiff sustains a claim of aiding and abetting if it established (1) the existence of a primary violation of the exchange act; (2) that the aider-abettor had knowledge of the primary violation; and (2) that the aider-abettor ‘knowingly and substantially participated In the wrong doing’”³⁴ (citation omitted)(emphasis added).

Gorgia, because of his part time status could not possibly intentionally, consciously, substantially, knowingly participate or have knowledge of any of the

³² S.E.C. v Kenneth Pasternak and John P. Leighton, 561 F. Supp 2d, 502 (June 24,2008) at 502

³³ Id at 502

³⁴ Id at 500

alleged violations caused by others. On the contrary, when violations were discovered Gorgia acted with all due haste to address, and reported such actions to the senior management. Gorgia made the necessary changes and instituted new rules and pronouncements to prevent future violations.

56. The elements of aiding and abetting are absent in this matter. Gorgia did not “share[d] the criminal intent of the principal” (United States v Roan Eagle, 867 F. 2d 346, 445 n.15 (8th Cir.), *cert denied*, 490 U.S. 1028 (1989)). And Gorgia did not have “the same requisite intent” (United States v. Labat 905 F.2d 18, 23 (2d Cir. 1990)).

CONCLUSION

Considering the foregoing, the allegations against Gorgia are unwarranted because of the following salient facts:

- Gorgia was part-time
- Gorgia was not empowered
- Gorgia did not have the final authority or decision making finality
- Gorgia was not the supervisor of Bloomfield, Martin, Labi or any other person at LBS reported to Senior Management and the Board of Directors
- The policy and procedures were in place to detect possible violations
- The absence of *mens rea* with Gorgia
- The complete and total absence of any motive, financial or otherwise.

The prayer before the Commission and the Honorable Brenda P. Murray is the granting of this Motion for Summary Disposition by dismissing this Matter and the allegations against Gorgia before the Securities and Exchange Commission.

Respectfully submitted

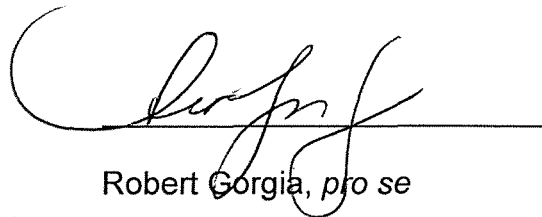
A handwritten signature in black ink, appearing to read 'Robert Gorgia', written in a cursive style.

Robert Gorgia, *pro se*

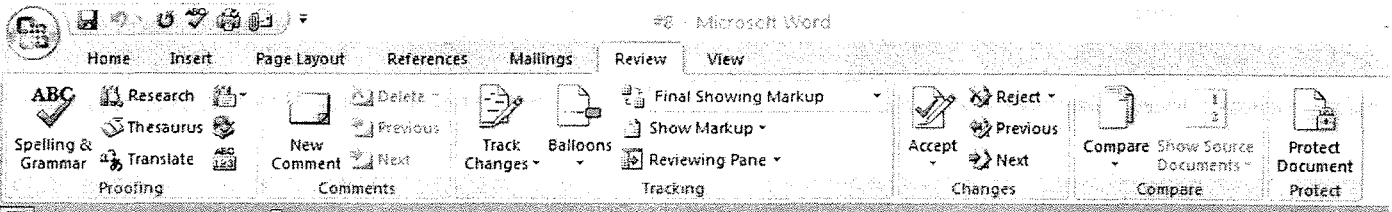
Dated: August 19th, 2010.

STATEMENT AND ATTESTATION

Pursuant to Rule 154(c) of the Rule of Practice, I, Robert Gorgia, do hereby attest and affirm that the foregoing Motion for Summary Disposition, inclusive of this Statement, and the Introduction exclusive of The Table of Contents, Index, Legal and Authoritative Schedule, and Exhibits is 6,910 words, as indicated in the attached properties for Microsoft Word.



Robert Gorgia, pro se



FACTUAL BACKGROUND

I. Background of Gorgia's Association with Leeb Brokerage Services

In order to determine the facts and circumstances in this particular case, it is necessary to be informed of the background of Gorgia's association with Leeb Brokerage Services ("LBS"). The historical "time line" of Gorgia's association with LBS is set forth herein as **Exhibit 1-1**. Gorgia was hired by LBS as a Part time Financial and Operations Principal ("FOP") in December 2004. Gorgia's increasing workload that led to her accepting the position as a part time FINOP.

Word Count

Statistics:

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| Words | 6,410 |
| Characters (no spaces) | 33,444 |
| Characters (with spaces) | 40,455 |
| Paragraphs | 274 |
| Lines | 709 |

Include textboxes, footnotes and endnotes

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The "compliance nightmare" (as stated in paragraph 40 of the OIP) was not limited to penny stocks. It predated Gorgia from the first day of transition (training) in December 2004 until his resignation on June 15, 2006. Eugene Miller ("Miller"), respondent in this matter, testified that "he (Miller) tried to get control of the New York Office" (Miller Tr. page 20 at 1-4) (**Exhibit 1-4**). In order to get the finances in order,

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ABC Spelling & Grammar Research Thesaurus Translate Proofing New Comment Delete Previous Next Comments Track Changes Balloons Reviewing Pane Tracking Final Showing Markup Show Markup Accept Reject Previous Next Compare Show Source Documents Protect Document Protect

Respondents,

Pursuant to Rule 250 of the Rules of Practice, Gorgia, acting *pro se*, hereby submits this Motion for Summary Disposition in the above mater before the Honorable Brenda Murray. The Order Instituting Proceedings ("OIP") dated April 27, 2010 states the violations in (1) Paragraph G. 55 as "will view of preventing and Paragraph G. 55 as "will of the Exchange Act and This brief will dem

Bloomfield, Labi, and the Exchange Act, with of the Securitles Act". (2) tions of Sections 17 (a) plation of failing

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