

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

ADMINISTRATIVE PROCEEDING
File No. 3-17104

In the Matter of

**BioElectronics Corp.,
IBEX, LLC,
St. John's, LLC,
Andrew J. Whelan
Kelly A. Whelan, CPA, and
Robert P. Bedwell, CPA,**

Respondents.

DECLARATION OF WILLIAM D. PARK

I, William D. Park, the undersigned, declare:

1. I am a Senior Director in the Enforcement Department of the Financial Industry Regulatory Authority or FINRA (formerly known as NASD). I have been employed by FINRA Enforcement for over 19 years where I have specialized in conducting hundreds of complex investigations and analyses of thousands of securities transactions. Prior to working at FINRA, I worked at a brokerage firm where I was responsible for maintaining the purchase and sale function of the firm. A copy of my Curriculum Vitae is attached as Exhibit B hereto. I have personal knowledge of the following facts and could testify competently to them.
2. In connection with the investigations in which I have been involved while at FINRA, I have reviewed and analyzed records related to transactions and activities surrounding

numerous securities transactions. Consequently I have developed significant experience with examinations involving various trading schemes, including numerous matters involving significant unregistered resales of microcap securities into the public market place (“microcap liquidations”).

3. I am considered a subject matter expert at FINRA concerning, among other things, suspicious trading schemes, such as microcap liquidations, and I regularly provide training to FINRA personnel, other regulators, or securities industry professionals on this and related subjects. I have also provided expert transaction analysis and testimony in securities related matters brought by other regulators or federal criminal authorities, including the Securities and Exchange Commission (“SEC”).
4. I have a bachelor’s degree in Economics from Virginia Polytechnic Institute and State University and hold the Certified Fraud Examiner (CFE), Certified Financial Services Auditor (CFSA), Certified Anti-Money Laundering Specialist (CAMS), and Certified Regulatory and Compliance Professional (CRCP) professional designations.
5. I have been asked by the Enforcement Division of the Securities and Exchange Commission (“Division”) to review and analyze certain transactions involving Bioelectronics Corporation (“BIEL”) and other parties and to render certain opinions regarding the same.
6. In conducting my analysis of the subject transactions, I have considered the provisions of Securities Act Rule 144 relating to resales of unregistered restricted or control securities. Among the key concepts I considered are the overall purpose of Rule 144; the volume limitations on resales by affiliates; and the unavailability of Rule 144 if the subject trading is part of a scheme to evade registration.

7. In connection with my work on this matter, I have reviewed documents and information relating to transactions involving the Respondents in this matter that I obtained through counsel for the Division and other public sources. The materials I reviewed include the following: a schedule produced by BIEL reflecting BIEL transactions with IBEX, LLC (“IBEX”); records pertaining to convertible debt transactions and stock purchase agreements; consulting agreements; transfer agent records; BIEL’s public filings; transcripts of testimony given during the Division’s investigation of this matter; and various trading records.
8. For purposes of this Declaration, “convertible debt” is defined as representing situations where BIEL received cash loans from IBEX and where the loan terms indicated that the loan would be paid back with common stock of BIEL.
9. As part of my analysis, I created a chronology of transactions involving BIEL securities during the period of January 27, 2010 through February 9, 2015, to show certain transactions in BIEL securities and the flow of funds derived from those transactions. The chronology is attached hereto as Exhibit A. This chronology includes the following:
 - Approximate date convertible debt issued to IBEX by BIEL was sold by IBEX to various entities, converted to shares, and issued to the entities (“Liquidating Entities”);
 - Dollar amount paid by Liquidating Entity to IBEX;
 - Share amount converted and sold into the public market place by Liquidating Entities;
 - Date range Liquidating Entity sold into the public market place;
 - Approximate date IBEX sent funds to BIEL in exchange for new convertible debt;

- Dollar amount of funds sent by IBEX to BIEL in exchange for new convertible debt;
- Total Shares Outstanding sold into the public market place through IBEX and Liquidating Entities as of year-end 2010, 2013, and 2014.

10. From January 2010 through February 2015, in at least 70 separate transactions, IBEX sold approximately 3.5 billion shares of BIEL stock to third party purchasers generally at a discount to then current market prices. In the majority of these transactions, IBEX simply sold the convertible notes it received from BIEL to these Liquidating Entities. In turn, the Liquidating Entities immediately converted the notes to shares of stock and sold the shares to the investing public. In other instances, the Liquidating Entities entered into a stock purchase agreement with IBEX to buy BIEL stock that IBEX had obtained in earlier transactions. My use of the term “convertible debt” in this declaration covers BIEL securities IBEX acquired and then sold to the Liquidating Entities by either method.

11. As each convertible note was converted, BIEL issued more shares that would be added to the existing total shares outstanding. By the end of December 2013, the Liquidating Entities had converted and sold approximately 27% of the total amount of issued and outstanding BIEL shares into the public market.

12. The Liquidating Entities sold the largest percentage of BIEL shares into the public market in 2014. From January through November of that year, the Liquidating Entities sold into the public market approximately 36% of the total number of BIEL shares issued and outstanding. During this time frame, the Liquidating Entities paid approximately \$1.99 million to IBEX for the shares they received. In turn, IBEX loaned BIEL

approximately 90% of this amount, or approximately \$1.8 million, and IBEX received new convertible debt in exchange for these loans.

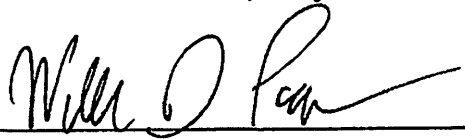
13. Between January 2010 and by November 2014, the Liquidating Entities sold approximately 53% of the total number of issued and outstanding BIEL shares into the public market.
14. Between January 2010 and February 2015, IBEX received approximately \$4 million in proceeds from the sale of BIEL shares to the Liquidating Entities.
15. Generally, the Liquidating Entities converted, deposited and sold BIEL shares almost immediately or within a very short period of time after acquiring them from IBEX.
16. During the period from January 2010 through February 2015, IBEX sold approximately 3.5 billion shares to various Liquidating Entities in at least 70 separate transactions. During this same period, IBEX transferred approximately \$4.9 million in funds to BIEL in dozens of separate transactions. IBEX's loans to BIEL closely followed IBEX's sales of securities to Liquidating Entities. For example, 39 separate loan transactions between IBEX and BIEL, involving at least \$2.6 million, were completed in less than 10 days following an IBEX sale of shares to Liquidating Entities. Of these, IBEX made 24 loans within three days or less of an IBEX sale to a third party. Moreover, the dollar amounts IBEX sent to BIEL frequently were close in value to the sums IBEX received from the Market Liquidators.
17. My analysis shows that through the use of a structured series of transactions, a substantial number of unregistered BIEL shares were sold into the public market. As discussed above, by November 2014, more than half (53%) of the total amount of issued and outstanding BIEL shares had reached the investing public, none of which had been sold

pursuant to a registration statement. Based on my training and experience, the frequency and pattern of trading in BIEL securities described above is consistent with a planned and organized pattern to benefit from the distribution of a significant amount of securities into the public market without complying with the registration requirements of Section 5 of the Securities Act.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and recollection.

Dated: *June 23, 2016*

Executed in Rockville, Maryland



**EXHIBIT A: Chronology of Activity -- BIEL Shares Issued via
IBEX and Liquidated**

SEC v. Bioelectronics Corp., et al
Chronology of Activity: BIEL Shares Issued via IBEX and Liquidated

Date (Approx. Date Shares Issued to Entity or Individual and or Funds from IBEX to Issuer)	Entity or Individual	Shares Issued	Shares Liquidated into Market Place	Date Range of Shares Liquidated Into Market Place	Funds to IBEX from Entity or Individual	Funds from IBEX to Issuer
01/27/10	Mazuma Holdings	4,000,000	4,000,000	2/3/2010 - 2/5/2010	\$80,000	
02/03/10	Mazuma Holdings	3,000,000	3,000,000	2/10/2010 - 2/12/2010	\$55,000	
02/09/10						\$135,000
02/09/10	Mazuma Holdings	2,000,000	2,000,000	2/16/2010 - 2/17/2010	\$40,000	
02/12/10	Mazuma Holdings	2,600,000	2,600,000	2/19/2010 - 2/22/2010	\$60,000	
02/17/10	Mazuma Holdings	2,600,000	2,600,000	2/25/2010 - 3/4/2010	\$60,000	
03/05/10	Mazuma Holdings	4,000,000	4,000,000	3/11/2010 - 3/12/2010	\$80,000	
03/11/10	Mazuma Holdings	4,000,000	4,000,000	3/19/2010 - 3/23/2010	\$80,000	
03/22/10	Mazuma Holdings	5,500,000	5,500,000	3/26/2010 - 4/1/2010	\$120,000	
03/31/10						\$310,000
04/06/10	Mazuma Holdings	6,000,000	6,000,000	4/13/2010 - 4/16/2010	\$138,000	
04/15/10						\$20,000
04/15/10	Mazuma Holdings	4,400,000	4,400,000	4/21/2010 - 4/23/2010	\$100,000	
04/21/10	Mazuma Holdings	3,800,000	3,800,000	4/28/2010 - 4/29/2010	\$80,000	
05/05/10						\$120,000
05/14/10						\$100,000
06/22/10						\$130,000
07/15/10						\$10,000
07/23/10						\$100,000
07/26/10	Simon Jacobson	1,000,000				
08/30/10	Mazuma Holdings	5,000,000	5,000,000	9/7/2010 - 9/14/2010	\$50,000	
08/30/10	Simon Jacobson	1,300,000				
09/07/10						\$50,000
09/13/10	Mazuma Holdings	5,000,000	5,000,000	9/14/2010 - 9/16/2010	\$50,000	
09/14/10						\$185,000
09/30/10						\$50,000
10/04/10						\$50,000
10/06/10	Asher Enterprises	5,000,000	5,000,000	10/12/2010 - 10/14/2010	\$50,000	
10/08/10						\$50,000
10/29/10	Goldstrand Investments	10,000,000				
11/04/10						\$40,000
11/05/10	Goldstrand Investments	15,000,000				
11/06/10	Simon Jacobson	5,000,000				
11/15/10						\$100,000
11/17/10	Simon Jacobson	700,000				
12/07/10						\$78,333
12/16/10						\$30,000
12/30/10						\$40,000
01/24/11	Benjamin Neuman	6,250,000				
01/26/11						\$50,000
01/27/11	Eastside Holdings	10,000,000				
01/31/11						\$40,000
02/01/11	Asher Enterprises	6,250,000	6,250,000	2/1/2011 - 2/3/2011	\$50,000	
02/02/11						\$125,000
02/09/11	Shmuel Hauck	2,500,000				
02/10/11	Asher Enterprises	6,250,000	6,250,000	2/11/2011 - 2/14/2011	\$42,000	
02/10/11	Robert McGuire	12,000,000				
02/14/11						\$62,000
02/28/11	Asher Enterprises	6,250,000	6,250,000	2/28/2011 - 3/2/2011	\$42,000	
03/01/11	Robert McGuire	2,750,000				

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03/01/11	Blake Joblin	250,000				
03/07/11						\$42,000
03/23/11						\$37,000
03/23/11	Asher Enterprises	6,250,000	6,250,000	3/24/2011 - 3/28/2011	\$38,000	
04/11/11						\$50,000
04/14/11						\$30,000
06/08/11	Joseph Noel	21,000,000				
06/16/11	Lauren Jarman	26,000,000				
06/30/11						\$35,000
06/30/11						\$10,000
07/19/11						\$6,000
07/28/11						\$60,000
08/15/11						\$18,000
08/17/11						\$5,000
07/31/12						\$68,500
09/30/12						\$133,500
12/14/12						\$35,000
01/09/13						\$15,000
01/23/13	Beufort Ventures	25,000,000	25,000,000	5/17/2013 - 5/21/2013	\$24,921	
01/29/13						\$25,000
02/05/13	Asten Wyman	59,444,862	59,444,862	2/14/2013 - 2/22/2013	\$47,556	
02/06/13						\$45,000
02/15/13						\$36,000
02/20/13	WHC Capital	48,269,286	48,269,286	2/21/2013 - 3/4/2013	\$35,429	
03/05/13						\$55,000
03/05/13	Asten Wyman	78,571,428	78,571,428	4/3/2013 - 5/23/2013	\$55,000	
03/27/13						\$90,000
03/27/13	WHC Capital	75,527,777	75,527,777	4/1/2013 - 5/21/2013	\$93,451	
04/12/13						\$50,000
04/23/13	Redwood Management	33,333,333	33,333,333	4/25/2013 - 4/30/2013	\$50,000	
05/03/13	Redwood Management	50,000,000	50,000,000	5/8/2013 - 5/13/2013	\$50,000	
05/03/13	JSJ	50,000,000	50,000,000	5/9/2013 - 6/6/2013	\$50,000	
05/06/13						\$50,000
05/07/13						\$50,000
05/15/13	Asten Wyman	58,823,529	58,823,529	5/24/2013 - 6/10/2013	\$50,000	
05/16/13						\$50,000
05/21/13	Beufort Ventures	50,000,000	50,000,000	7/23/2013 - 9/6/2013	\$50,000	
05/23/13	ATG (IR Consultant)	30,000,000				
05/31/13	Redwood Management	75,000,000	75,000,000	6/4/2013 - 6/12/2013	\$75,000	
06/03/13						\$75,000
09/26/13	Redwood Management	74,962,519	74,962,519	10/2/2013 - 10/11/2013	\$50,000	
09/27/13						\$50,000
10/15/13						\$25,000

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10/15/13	Redwood Management	55,555,555	55,555,555	10/21/2013 - 10/22/2013	\$25,000	
10/30/13						\$13,000
11/06/13	Redwood Management	55,555,555	55,555,555	11/13/2013 - 11/14/2013	\$25,000	
11/08/13						\$25,000
12/12/13	Redwood Management	71,428,571	71,428,571	12/16/2013 - 12/18/2013	\$25,000	
12/13/13						\$9,500
12/18/13						\$15,000
12/26/13	Redwood Management	100,000,000	100,000,000	12/30/2013 - 12/31/2013	\$25,000	
12/27/13						\$25,000
01/06/14	Redwood Management	100,000,000	100,000,000	1/8/2014 - 1/10/2014	\$25,000	
01/09/14						\$25,000
01/15/14	Redwood Management	100,000,000	100,000,000	1/16/2014 - 1/17/2014	\$25,000	
01/17/14						\$4,900
01/21/14						\$20,100
01/23/14	Redwood Management	100,000,000	100,000,000	1/27/2014 - 1/29/2014	\$25,000	
01/24/14						\$25,000
01/29/14	Redwood Management	100,000,000	100,000,000	1/31/2014 - 2/5/2014	\$25,000	
01/30/14						\$25,000
02/07/14						\$25,000
02/07/14	Redwood Management	125,000,000	125,000,000	2/11/2014 - 2/14/2014	\$25,000	
02/07/14	AGS Capital	328,237,137	328,237,137	2/18/2014 - 4/11/2014	\$50,000	
02/13/14	Redwood Management	125,000,000	125,000,000	2/19/2014 - 2/21/2014	\$25,000	
02/14/14						\$25,000
02/18/14						\$49,000
02/18/14						\$27,000
02/21/14	Redwood Management	125,000,000	125,000,000	2/24/2014	\$25,000	
02/21/14	Redwood Management	38,461,538	38,461,538	2/24/2014 - 2/25/2014	\$25,000	
02/24/14						\$40,000
02/26/14						\$50,000
02/26/14	Redwood Management	16,666,666	16,666,666	3/7/2014	\$50,000	
03/03/14	Redwood Management	52,631,579	52,631,579	3/10/2014	\$100,000	
03/04/14						\$100,000
03/12/14						\$130,000
03/12/14	Redwood Management	75,000,000	75,000,000	3/14/2014 - 3/19/2014	\$150,000	
03/21/14	Deer Valley	13,000,000	13,000,000	3/28/2014	\$25,000	

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03/26/14	Redwood Management	78,947,368	78,947,368	3/27/2014 - 3/28/2014	\$150,000	
03/27/14						\$150,000
04/01/14	Redwood Management	31,750,000	31,750,000	4/2/2014 - 4/4/2014	\$60,325	
04/02/14						\$60,305
04/03/14	Redwood Management	68,421,052	68,421,052	4/7/2014 - 4/9/2014	\$130,000	
04/04/14	Deer Valley	13,000,000	13,000,000	4/14/2014 - 4/15/2014	\$25,000	
04/07/14						\$100,000
04/22/14	Redwood Management	38,461,538	38,461,538	4/23/2014 - 4/24/2014	\$50,000	
04/28/14						\$130,000
04/28/14	Redwood Management	41,666,666	41,666,666	4/30/2014 - 5/12/2014	\$50,000	
04/30/14	Redwood Management	50,000,000	50,000,000	4/30/2014 - 5/12/2014	\$60,000	
05/05/14						\$60,000
05/09/14	Redwood Management	50,000,000	50,000,000	5/13/2014 - 5/16/2014	\$60,000	
05/15/14	Redwood Management	44,642,857	44,642,857	5/19/2014 - 5/22/2014	\$62,500	
05/20/14						\$120,000
05/22/14	Redwood Management	48,076,923	48,076,923	5/27/2014 - 5/28/2014	\$62,500	
06/04/14	Redwood Management	44,285,714	44,285,714	6/5/2014 - 6/9/2014	\$62,000	
06/12/14						\$130,000
06/12/14	Redwood Management	53,571,428	53,571,428	6/13/2014 - 6/18/2014	\$75,000	
06/12/14	Tangiers Investments	43,362,036	43,362,036	6/17/2014 - 7/7/2014	\$64,685	
06/20/14	Redwood Management	62,500,000	62,500,000	6/24/2014 - 6/26/2014	\$75,000	
07/01/14						\$150,000
07/10/14	Redwood Management	45,454,545	45,454,545	7/11/2014 - 7/17/2014	\$50,000	
07/16/14						\$50,000
08/01/14						\$50,000
08/01/14	Redwood Management	41,666,666	41,666,666	8/4/2014 - 8/7/2014	\$50,000	
08/14/14	Redwood Management	41,666,666	41,666,666	8/15/2014 - 8/19/2014	\$50,000	
08/20/14						\$50,000
08/21/14	Redwood Management	41,666,666	41,666,666	8/25/2014	\$50,000	
08/27/14	Redwood Management	41,666,666	41,666,666	8/28/2014 - 9/2/2014	\$50,000	
09/04/14						\$50,000
09/10/14	Tangiers Investments	58,471,233	58,471,233	9/15/2014 - 9/25/2014	\$76,245	
09/22/14						\$25,000

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Chronology of Activity: BIEL Shares Issued via IBEX and Liquidated

<i>Date (Approx. Date Shares Issued to Entity or Individual and or Funds from IBEX to Issuer)</i>	Entity or Individual	Shares Issued	Shares Liquidated into Market Place	Date Range of Shares Liquidated Into Market Place	Funds to IBEX from Entity or Individual	Funds from IBEX to Issuer
09/23/14	Redwood Management	41,666,666	41,666,666	9/24/2014 - 9/26/2014	\$50,000	
09/30/14						\$32,000
10/27/14						\$46,000
11/17/14						\$50,000
11/17/14	Tangiers Investments	41,666,667	41,666,667	11/28/2014 - 12/9/2014	\$50,000	
02/09/15	Redwood Management	100,000,000	100,000,000	2/10/2015 - 2/18/2015	\$50,000	

3,608,730,692

3,464,980,692

\$3,984,612

\$4,908,138

EXHIBIT B: William D. Park Curriculum Vitae

Curriculum Vitae as of 12/11/2015
William D. Park, CFE, CFSA, CRCP, CAMS
Senior Director - Case Development Team
FINRA Enforcement
15200 Omega Drive, 3rd Floor
Rockville, MD 20850-3241
bill.park@finra.org
t 301 258-8568 f 202 721-8349

Overview:

As a securities brokerage industry regulator for most of his career, Mr. Park has gained a vast amount of experience in the securities industry. For almost 19 years, he has been a securities regulator with the industry's self-regulatory organization, Financial Industry Regulatory Authority or FINRA (formerly known as NASD). As an investigator and currently as a Senior Director in the Department of Enforcement he has conducted numerous complex investigations into securities brokerage firm and securities transaction activities in efforts to promote investor protection and market integrity.

Through his investigations, Mr. Park has examined and analyzed voluminous amounts of securities firm books and records, supervisory systems and internal controls. He has reviewed and analyzed the transactions of thousands of securities, numerous customer brokerage accounts and countless SEC filings of various issuers. In efforts to progress the various fact-finding investigations, he has conducted detailed on-the-record interviews of brokerage firm personnel from all aspects of the industry including, brokerage firm owners, compliance officers, AML officers, investment bankers, traders, and brokers. Mr. Park has presented his investigative findings in various forms including sworn testimony. As a fact witness, he has had the opportunity to testify to his investigative findings approximately nine times across multiple venues. Most of his investigative testimony appearances have been to explain his investigative findings relating to suspicious trading schemes. Based on Mr. Park's investigations of potential securities related violations, in a countless number of cases, the parties have either settled or received a litigated decision that resulted in them being fined, suspended or barred from the securities industry for their activities.

In 2011, Mr. Park started the Case Development Team within Enforcement. His group is responsible for identifying and developing enforcement investigations into high impact, novel, and complex securities areas across the country. In carrying out this mission, Mr. Park and his team has developed an expertise for analyzing voluminous amounts of data and information to identify problematic patterns, concentrations and trends. Mr. Park has developed significant experience with examinations involving suspicious trading schemes, including excessive / unauthorized trading schemes, microcap unregistered liquidations and manipulative prearranged trading scenarios. As a result, Mr. Park is considered a subject matter expert at FINRA concerning suspicious trading schemes, and regularly gives training to FINRA personnel, other regulators, or securities industry professionals on the subject. In 2014, Mr. Park gave training to the SEC Microcap Task Force on microcap trading schemes.

In connection with securities matters brought by other regulators or criminal authorities, Mr. Park has provided expert transaction analysis and testimony. In March of 2007, Mr. Park testified as an expert witness in the securities industry for the District of New Jersey in the federal trial *US v. Gordon (Case 05-698)* where he talked about how securities reach the market place, the operation of the trading markets and market manipulation. In September of 2007, he testified as an expert witness in the securities industry for the Eastern District of New York in the federal trial *US v. Leonard (Case 02-881)* where he talked about material information needed to be disclosed to investors and important aspects to consider when determining if an investment is an investment contract. In June of 2008, Mr. Park provided expert witness testimony again in the Eastern District of New York in the federal trial *US v. Meszaros (Case 06-503)* where he talked about various broker dealer operational and industry terms, obligations of registered representatives, and day trading. In December 2008, he provided transactional analysis exhibits in a Canadian regulatory disciplinary hearing involving an alleged marketing manipulation in *IIROC v. Konstantinos Georgakopoulos* where my analysis was included in the panel decision. In June 2009, Mr. Park provided expert witness testimony in the Southern District of New York in the federal trial *US v. Nouri (Case 07-1029)* where he talked about the operation of the trading markets and prearranged trading patterns. Recently, in 2015, he provided transactional analysis to the SEC in *SEC v. Kelley, et al (Case 2:14-cv-02827)* pertaining to prearranged trading manipulation.

Curriculum Vitae as of 12/11/2015
William D. Park, CFE, CFSA, CRCP, CAMS

Employment History:

<p>FINRA <i>Department of Enforcement</i> February 1997 to Present</p> <p>Senior Director – Spring 2011 - Present Associate Director / Director – Fall 2006 to Spring 2011 Assistant Director – Fall 2003 to Fall 2006 Supervisor – Fall 2002 to Fall 2003 Investigator – February 1997 to Fall 2002</p>	<p>Department of Enforcement is charged with vigorous, fair and effective enforcement of federal securities laws and regulations. Federal law gives FINRA authority to discipline securities firms and individuals in the securities industry who violate the rules. FINRA can fine, suspend or even expel them from the industry. As an Enforcement investigator Mr. Park independently conducted and progressed investigations and functioned as the lead examiner on investigations with junior examiners. As a Director, he lead a team of lawyers, investigators, paralegals and support staff in conducting complex securities investigations. Currently as Senior Director, he leads the Case Development Team (“CDT”) to identify, develop, and coordinate investigations into high impact, novel, and complex securities are across the country.</p>
<p>Legg Mason Wood Walker <i>Trade Control Department</i> May 1995 to February 1997</p> <p><i>Client Account Services Department</i> Summer intern in 1993 and 1994.</p>	<p>Securities brokerage firm based out of Baltimore, MD. In the Trade Control Department Mr. Park worked as an analyst and then Assistant Supervisor responsible for the operations of the purchase and sale function of the firm. His duties included reconciliation of transactions, covering trading errors in the market and checking for best execution for transactions sent to various regional exchanges.</p>

Education: Virginia Tech - B.A. Economics in May 1995

Professional Certifications Held:

<p>Certified Fraud Examiner (CFE)</p>	<p>CFEs pass an examination that tests their knowledge and expertise in the four primary areas of fraud investigation: Fraudulent Financial Transactions, Legal Elements of Fraud, Fraud Investigation, and Criminology and Ethics. CFEs have the ability to examine data and records to detect and trace fraudulent financial transactions, interview suspects to obtain information, communicate investigative findings in written and oral form and testify at trial.</p> <p>□ President of Washington DC Chapter of Certified Fraud Examiners for 2007-2008 and 2008-2009 chapter years.</p>
<p>Certified Financial Services Auditor (CFSA)</p>	<p>In addition to financial services auditing experience, CFSAs have to pass an examination to show their knowledge financial services auditing practices and methodologies relating to securities, banking and insurance industries.</p>
<p>Certified Anti-Money Laundering Specialist (CAMS)</p>	<p>CAMS complete a rigorous examination demonstrating their aptitude and expertise in anti-money laundering detection and enforcement. The examination covers money laundering and terrorist financing methods, the best practices to stop these crimes, the key legislation in place worldwide, global AML standards and developing defenses for financial institutions to stop terrorist financing and money laundering.</p>
<p>Certified Regulatory and Compliance Professional (CRCP)</p>	<p>Designation offered by FINRA Institute through Wharton School. Rigorous 120 credit hour course of instruction on the foundation, theory and practical application of securities laws and regulation.</p>

Curriculum Vitae as of 12/11/2015
William D. Park, CFE, CFSA, CRCP, CAMS

Awards:

- ❑ FINRA Premier Achievement Award (2015)
- ❑ FINRA Chairman's Award (2013)
- ❑ FINRA / Wharton Leadership Program (2013)
- ❑ FINRA Outstanding Achievement Award (2009)
- ❑ NASD President's Award (2005, 2003, 2002)
- ❑ NASD Excellence in Service Award (2000)

Presentations / Training Given:

General Securities Fraud and AML

- ❑ FINRA Subject Matter Expert
- ❑ FINRA Introduction to Securities Fraud Schemes: *Developed training content and implemented several training sessions to investigators on different securities fraud schemes (most recent – 2014)*
- ❑ Securities Fraud Schemes: *Training to CFEs (2013)*
- ❑ Drug Enforcement Agency: *Training to DEA Agents on AML and the Securities Industry (2015)*

Specific Suspicious Trading Schemes (typically related to *Microcap Unregistered Liquidations; Manipulative Prearranged Trading Scenarios, or Excessive / Unauthorized Trading Schemes*)

- ❑ FINRA Subject Matter Expert
- ❑ FINRA Internal Training: *Regular and frequent training to investigators and attorneys across the country on microcap liquidation and trading schemes and how they could lead to potential Section 5, Market Manipulation, Adverse Interest Fraud, AML, and Supervisory Violations (given at least yearly)*
- ❑ FINRA Annual Conference: *Electronic Market Access (DMA) Investigations (2012)*
- ❑ Canadian Regulators: *Roles of Trends of US Broker dealers and OTC markets – Calgary, Alberta (2013)*
- ❑ Preventative Compliance Conferences: *Training to New York and New Jersey area broker dealers concerning problematic microcap liquidation and trading schemes (most recent – NJ 2015).*
- ❑ SEC and State Regulators via 19(d) or Joint Regulatory Conferences *(given approximately yearly)*
- ❑ SEC Roundtable on the Execution, Clearance and Settlement of Microcap Securities (2011)
- ❑ SEC Microcap Task Force and Working Group (2014)

Complex Transaction and Data Analysis

- ❑ FINRA Subject Matter Expert
- ❑ FINRA Data and Analytics Working Group (2014-2015)
- ❑ FINRA Internal training on Analysis of Transaction Data (2015)
- ❑ SEC Southeast Regional Conference: *Data Analysis (2014)*

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Recent Notable Cases Where CDT Conducted Underlying Transaction Analysis

- **Aegis Capital:** FINRA Fines Aegis Capital Corp. \$950,000 for Sales of Unregistered Penny Stocks and AML Violations
 - *FINRA found that from April 2009 to June 2011, Aegis Capital Corp. liquidated nearly 3.9 billion shares of five penny stocks that were not registered with the SEC and not exempt from registration. <https://www.finra.org/newsroom/2015/finra-fines-aegis-capital-corp-950000-sales-unregistered-penny-stocks-and-aml>*

- **John Carris:** FINRA Hearing Panel Expels John Carris Investments and Bars CEO George Carris for Fraud.
 - *The panel found that JCI and Carris manipulated the price of Fibrocell stock through unfunded purchases of large blocks of the stock and pre-arranged trading accomplished through reported matched limit orders. <https://www.finra.org/newsroom/2015/finra-hearing-panel-expels-john-carris-investments-and-bars-ceo-george-carris-fraud>*

- **Global Arena:** FINRA Sanctions 10 Former Global Arena Representatives as a Result of FINRA Crackdown on Broker Migration
 - *FINRA found that certain Global Arena representatives engaged in securities fraud by, among other things, using misleading sales pitches and high pressure sales tactics to make sales of junk bonds and other securities to customers. Brokers at the firm also churned existing customer accounts by recommending frequent trades and made unsuitable recommendation. <https://www.finra.org/newsroom/2015/finra-sanctions-10-former-global-arena-representatives-result-finra-crackdown-broker>*