

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

In the Matter of the Application of:

TREVOR MICHAEL SALIBA

For Review of Action taken by

FINRA

No:

APPLICATION FOR REVIEW

Pursuant to FINRA Rule 9370(a) of the FINRA Code of Procedure, Section 19(d)(2) of the Securities and Exchange Act of 1934, C.F.R. §201.420, and Rule 420 of the SEC Rules of practice, Respondent Trevor Michael Saliba (“Respondent”) submits this Application for Review of the disciplinary action taken against him by FINRA in the matter captioned *Department of Enforcement v. Trevor Michael Saliba*, Compl. No. 2013037522501r (October 6, 2022). In support of this application, Respondent states as follows:

1. On October 6, 2022, following a remand from the U.S. Securities and Exchange Commission (the “Commission”), the National Adjudicatory Counsel (“NAC”) issued a Decision clarifying certain findings that the NAC made in an earlier Decision issued in January 2019 (on appeal of a Decision issued by a FINRA Hearing Panel dated December 2017). Specifically, in response to direction provided by the Commission, the NAC concluded that Respondent knew he was providing documents that contained false information to FINRA staff, and that this misconduct justified the imposition of a permanent bar.

2. The NAC’s determination was erroneous for the following reasons: (1) the Hearing Panel erred in finding, and the NAC erred in agreeing, that Respondent knew the

“Miller Memos” were false when he submitted them to FINRA staff; and (2) the sanction of a permanent bar is punitive rather than remedial in nature and is otherwise unsupported.

3. Respondent can be served at the following address:

c/o Alan M. Wolper
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Respectfully submitted this 4th day of November, 2022.

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Counsel for Respondent

CERTIFICATE OF SERVICE

I hereby certify that Respondent's APPLICATION FOR REVIEW has been filed through the eFap filing system and served upon the following parties via email entitled to notice as follows:

FINRA
Attn: Celia Passaro
1735 K Street, N.W.
Washington, D.C. 20006
ersilia.passaro@finra.org
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This 4th day of November, 2022.



Heidi VonderHeide