

**BEFORE THE  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, DC**

In the Matter of the Application of

Paul H. Giles for Review of

FINRA Action

File No. 3-20267

**FINRA'S ADDITIONAL BRIEF CONCERNING MOOTNESS**

Alan Lawhead  
Vice President and  
Director – Appellate Group

Andrew J. Love  
Associate General Counsel

FINRA  
Office of General Counsel  
1735 K Street, NW  
Washington, DC 20006  
202-728-8281 – Telephone  
202-728-8264 – Facsimile  
andrew.love@finra.org  
nac.casefilings@finra.org

June 6, 2022

**TABLE OF CONTENTS**

	<b><u>Page</u></b>
I. INTRODUCTION .....	1
II. FACTUAL AND PROCEDURAL BACKGROUND.....	3
A. California Revokes Giles’ Insurance Licenses .....	3
B. The First SD Notice .....	3
C. Giles Appeals the First SD Notice and FINRA Issues the Second SD Notice .....	4
D. Giles Re-Acquires One of His Two Revoked California Insurance Licenses and the Commission Asks for Supplemental Briefing.....	4
E. Giles Files the Kentucky Appeal Challenging the Second SD Notice .....	5
F. Giles Re-Acquires the Second of His Two Revoked California Insurance Licenses .....	6
III. ARGUMENT .....	6
A. The Standard for Determining Whether an Appeal is Moot.....	7
B. Giles’ Appeal is Moot.....	7
C. Giles’ Arguments that this Appeal is Not Moot Are Meritless .....	9
IV. CONCLUSION.....	13

**TABLE OF AUTHORITIES**

	<b><u>Page(s)</u></b>
<b><u>FEDERAL CODE</u></b>	
15 U.S.C. § 78c.....	7
15 U.S.C. § 78o .....	7, 8
15 U.S.C. § 78s.....	2, 10, 11, 12
<b><u>COMMISSION DECISIONS AND ORDERS</u></b>	
<i>Burst.Com, Inc.</i> , Exchange Act Release No. 43198, 2000 SEC LEXIS 1735 (Aug. 23, 2000).....	8
<i>Disqualification of Felons and Other “Bad Actors” from Rule 506 Offerings</i> , Securities Act Release No. 9414, 2013 SEC LEXIS 2000 (July 10, 2013).....	7-8
<i>Beatrice J. Feins</i> , 51 S.E.C. 918 (1993) .....	12
<i>Sec. Indus. and Fin. Mkts. Ass’n</i> , Exchange Act Release No. 72182, 2014 SEC LEXIS 1686 (May 16, 2014).....	11
<i>Marshall Fin., Inc.</i> , 57 S.E.C. 869 (2004) .....	7, 12
<i>Meyers Assocs., L.P.</i> , Exchange Act Release No. 81778, 2017 SEC LEXIS 3096 (Sept. 29, 2017).....	7, 8, 12
<i>Blair Edwards Olsen</i> , Exchange Act Release No. 93216, 2021 SEC LEXIS 2978 (Sept. 30, 2021).....	8
<i>Robert M. Ryerson</i> , Exchange Act Release No. 57839, 2008 SEC LEXIS 1153 (May 20, 2008).....	12
<i>W.C.W. Western Canada Water Enters., Inc.</i> , 50 S.E.C. 134 (1989).....	8
<i>Eric David Wanger</i> , Exchange Act Release No. 79008, 2016 SEC LEXIS 3770 (Sept. 30, 2016).....	10, 11

**FINRA BY-LAWS AND RULES**

FINRA By-Laws, Art. III, Sec. 4.....7

FINRA Rule 8312.....10, 11

**BEFORE THE  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, DC**

In the Matter of the Application of

Paul H. Giles for Review of

FINRA Action

File No. 3-20267

**FINRA’S ADDITIONAL BRIEF CONCERNING MOOTNESS**

**I. INTRODUCTION**

Pursuant to the Commission’s order requesting additional briefing dated April 18, 2022, FINRA urges the Commission to dismiss Giles’ appeal because it is moot. Giles was statutorily disqualified based upon a September 2009 Default Decision and Order of Revocation (the “California Order”) entered by California’s Department of Insurance. The California Order revoked two insurance licenses held by Giles, which permitted him to engage in specified insurance business. After Giles filed this appeal in April 2021 challenging FINRA’s determination that the California Order rendered him disqualified, Giles reapplied for, and has recently obtained, both of his revoked licenses. Giles is thus now permitted to engage in the insurance activities that California had prohibited him from engaging in, the sanctions imposed by the California Order are no longer in effect, and Giles is no longer barred by the California Order from engaging in insurance activities. Consequently, he is no longer statutorily disqualified based upon the California Order under the Securities Exchange Act of 1934 (“Exchange Act”) and FINRA’s By-Laws and this appeal contesting his status as a disqualified individual is moot.

Giles attempts to keep this appeal alive based upon two arguments, both of which lack merit. First, Giles argues that his appeal is not moot because of issues related to another appeal that he filed, in which he challenges FINRA's separate determination that he is disqualified based upon orders revoking insurance licenses entered by regulators in Washington State and Kentucky (hereinafter, the "Kentucky Appeal"). The Commission should reject Giles' argument, as this appeal and the Kentucky Appeal are separate and distinct and the relief he seeks in this appeal—an order finding that he is not disqualified by virtue of the California Order—would not redress any actual injury suffered by Giles because he is no longer disqualified pursuant to the California Order.

Second, Giles argues that this appeal is not moot because FINRA may require him to amend his Uniform Application for Securities Industry Registration or Transfer ("Form U4") to disclose that the California Order was an order that barred him from engaging in insurance activities in California. Giles asserts that such future, potential action by FINRA would result in inaccurate public disclosures concerning the California Order on BrokerCheck. BrokerCheck, however, currently characterizes the California Order as a "revocation" (Giles preferred nomenclature). And, even if Giles' arguments concerning any purported mischaracterization of the California Order had a factual or legal basis, which they do not, the Commission would not have jurisdiction under Exchange Act Section 19(d) to review any purported future action by FINRA to require Giles to amend his Form U4. FINRA therefore requests that the Commission dismiss this appeal as moot.

## II. FACTUAL AND PROCEDURAL BACKGROUND

### A. California Revokes Giles' Insurance Licenses

On September 8, 2009, California's Department of Insurance entered the California Order. (RP 007.) The California Order revoked two insurance licenses held by Giles (a license as a life-only agent and a license as an accident-and-health agent), each of which granted him permission to engage in specific insurance activities. (RP 005.) The California Order revoked Giles' insurance licenses because he failed to respond to two requests for information concerning unpaid tax liens. (RP 001, 005.)

### B. The First SD Notice

Giles did not promptly disclose the California Order after it was entered. Instead, he waited more than eleven years to disclose the California Order on his Form U4. (RP 045-46.) Once FINRA became aware of the California Order after Giles belatedly disclosed it, FINRA promptly issued Giles' employing firm a notice dated March 24, 2021 (the "First SD Notice"). (RP 013.) The First SD Notice informed Giles' firm that the California Order rendered him statutorily disqualified and it was therefore required to seek FINRA's approval for Giles to continue to associate with the firm. FINRA based its disqualification determination on the undisputed fact that, as a result of California's license revocations, Giles was prohibited from transacting insurance business in the state and the California Order had the practical effect of barring him from acting in the capacities for which he was previously licensed. Consequently, FINRA determined that the California Order rendered Giles statutorily disqualified under the Exchange Act and FINRA's By-Laws.

C. Giles Appeals the First SD Notice and FINRA Issues the Second SD Notice

On April 21, 2021, Giles appealed the First SD Notice and FINRA’s determination that he was statutorily disqualified pursuant to the California Order, and sought to stay the effectiveness of the First SD Notice (which the Commission ultimately denied).

On May 6, 2021, FINRA issued Giles’ employing firm a second notice (the “Second SD Notice”) informing it that Giles was also subject to statutory disqualification based upon two additional orders entered by regulators in Kentucky and Washington.<sup>1</sup> Giles did not promptly appeal FINRA’s determination that he was disqualified because of the Kentucky and Washington orders as set forth in the Second SD Notice. Rather, as described below, he waited six months to do so.

D. Giles Re-Acquires One of His Two Revoked California Insurance Licenses and the Commission Asks for Supplemental Briefing

In August 2021, during the course of briefing in connection with this appeal, Giles informed the Commission that California granted Giles a life-only agent license and a variable contracts agent license. Based upon Giles’ statement that California had granted him permission to engage in certain insurance business, on August 27, 2021, the Commission requested that the parties file briefs addressing whether it should dismiss Giles’ appeal as moot. In its order

---

<sup>1</sup> Contrary to Giles’ claim that the SD Notice simply “added two orders to support FINRA’s already existing determination” that Giles was disqualified pursuant to the California Order, the orders entered by Washington and Kentucky served as another, independent basis for finding that Giles was statutorily disqualified. *See* Giles Amended Additional Brief in Support of Application for Review, at 3. This fact is underscored by FINRA’s requirement that Giles obtain both of his revoked California insurance licenses, to eliminate the California Order as a basis for Giles’ disqualification. Once he had done so, FINRA agreed that it would coordinate with regulators in Kentucky to facilitate Giles’ reacquisition of his revoked Kentucky licenses to eliminate the other current basis for Giles’ disqualification that is the subject of the Kentucky Appeal.

scheduling additional briefing, the Commission expressly stated that the Second SD Notice was not currently before it on appeal.<sup>2</sup>

The parties filed briefs pursuant to the Commission's August 2021 order in which they asserted that this appeal was not moot, albeit for different reasons. FINRA asserted that the appeal was not moot because Giles had not obtained both licenses revoked by the California Order. Giles thus continued to be prohibited from engaging in insurance activities related to the license he had not obtained, was barred from engaging in these activities pursuant to the California Order, and continued to be statutorily disqualified pursuant to Commission precedent.

E. Giles Files the Kentucky Appeal Challenging the Second SD Notice

In October 2021, Giles filed the Kentucky Appeal (Admin. Proc. File No. 3-20634) to challenge FINRA's May 2021 determination in the Second SD Notice that he was statutorily disqualified based upon the orders entered by Kentucky and Washington that revoked insurance licenses held by Giles in those states. Giles subsequently filed a motion to consolidate the Kentucky Appeal with this appeal, which FINRA opposed. Giles' motion remains pending. Giles has filed his opening brief and FINRA has filed its opposition brief in the Kentucky Appeal. Giles has requested, with FINRA's consent, several extensions of the deadline to file his

---

<sup>2</sup> Similarly, in July 2021 FINRA stated in its opposition brief filed in this appeal that, "[a]lthough not the subject of this appeal, FINRA notified Ameriprise that Giles was subject to statutory disqualification based upon" the Kentucky and Washington revocations (which FINRA referenced in its opposition brief to refute Giles' statement that he has never shown an unwillingness to comply with rules or regulations). *See* FINRA's Brief in Opposition to Application for Review, at 6.

reply brief while Giles attempts to re-obtain all insurance licenses previously revoked by Kentucky.<sup>3</sup>

F. Giles Re-Acquires the Second of His Two Revoked California Insurance Licenses

In April 2022, and in connection with Giles' request for an extension of time to file a reply in the Kentucky Appeal, Giles informed the Commission that California had issued him the remaining revoked insurance license. Consequently, Giles now possesses both insurance licenses that had been revoked pursuant to the California Order. The Commission subsequently requested additional briefing in this appeal to determine whether it should now be dismissed as moot.

### III. ARGUMENT

Mootness is precisely why the Commission should dismiss this appeal. Giles' appeal no longer presents an issue for which the Commission, if it rules in his favor, can grant effective relief. Giles is no longer prohibited from engaging in insurance business in California. He has obtained both of the insurance licenses revoked pursuant to the California Order and may now engage in the lines of business covered by those two licenses. Under Commission precedent, Giles is no longer barred from engaging in insurance business in California and he is no longer statutorily disqualified because of the California Order. Thus, the relief that he seeks in this appeal—a ruling from the Commission that he is not disqualified because of the California

---

<sup>3</sup> After FINRA issued the Second SD Notice, Giles re-obtained the license revoked by Washington and one of the two licenses revoked by Kentucky. Giles, however, has not yet obtained all of the insurance licenses that Kentucky revoked. Giles therefore continues to be statutorily disqualified as set forth in the Second SD Notice because Kentucky has not granted Giles all of the licenses that it had previously revoked.

Order—is no longer necessary and would offer Giles no relief. FINRA urges the Commission to dismiss this appeal and reject Giles’ efforts to keep it alive.

A. The Standard for Determining Whether an Appeal is Moot

It is well settled that an application for review is moot when “even a favorable decision by the Commission would entitle [the applicant] to no relief.” *Marshall Fin., Inc.*, 57 S.E.C. 869, 877 (2004) (dismissing an appeal as moot). The Commission has explained that a matter will be dismissed “as moot unless the complaining party has ‘suffered some actual injury that can be redressed by a favorable judicial decision.’” *Id.* at 875.

B. Giles’ Appeal Is Moot

Giles’ appeal of the First SD Notice no longer presents an issue for which the Commission may grant him favorable relief. Accordingly, the Commission should dismiss this appeal as moot.

Under the Exchange Act, a person is statutorily disqualified if, among other things, he is subject to a final order of a state insurance regulator that bars him from “engaging in the business of . . . insurance.” *See* 15 U.S.C. §§ 78c(a)(39)(F), 78o(b)(4)(H)(i); *see also* FINRA By-Laws, Art. III, Sec. 4 (incorporating the definition of statutory disqualification set forth in the Exchange Act). The Commission has stated that if a state regulator’s order prohibits a person from engaging in an activity, it has the practical effect of a bar regardless of the nomenclature used in the order, and thus is disqualifying as a bar order under Exchange Act Section 15(b)(4)(H)(i). *See Meyers Assocs., L.P.*, Exchange Act Release No. 81778, 2017 SEC LEXIS 3096, at \*15-16 (Sept. 29, 2017) (stating that in interpreting language nearly identical to Exchange Act Section 15(b)(4)(H), “[w]e concluded that an order should be treated as a ‘bar’ if it had the ‘practical effect of a bar’ by ‘prohibit[ing] a person from engaging in a particular activity’”) (citing

*Disqualification of Felons and Other “Bad Actors” from Rule 506 Offerings*, Securities Act Release No. 9414, 2013 SEC LEXIS 2000, at \*47 (July 10, 2013)); 15 U.S.C. § 78o(b)(4)(H).

The California Order was a disqualifying state bar order when it was entered because Giles was prohibited from engaging in insurance activities as a life-only agent and as an accident-and-health agent pursuant to the sanctions imposed by the California Order. The California Order therefore had the practical effect of a bar and rendered him statutorily disqualified under Exchange Act Section 15(b)(4)(H)(i). *See Meyers Assoc., L.P.*, 2017 SEC LEXIS 3096, at \*15-16; 15 U.S.C. § 78o(b)(4)(H)(i).

However, since FINRA issued the First SD Notice and Giles filed this appeal, California has reissued Giles’ two revoked insurance licenses. As a result, Giles is no longer prohibited from engaging in insurance activities in California as a life-only agent and as an accident-and-health agent, and the sanctions imposed by the California Order are no longer in effect. Under Commission precedent, Giles is not currently barred from engaging in insurance activities because of the California Order and he is no longer statutorily disqualified because of that order. This appeal, in which Giles seeks a ruling from the Commission that he is not statutorily disqualified because of the California Order, is moot. *Cf. Blair Edwards Olsen*, Exchange Act Release No. 93216, 2021 SEC LEXIS 2978, at \*10 (Sept. 30, 2021) (dismissing appeal requesting that the Commission vacate a bar as moot because FINRA vacated the bar during the pendency of the appeal); *Burst.Com, Inc.*, Exchange Act Release No. 43198, 2000 SEC LEXIS 1735 (Aug. 23, 2000) (dismissing as moot applicant’s appeal of FINRA’s decision to remove quotations of the applicant’s securities from the OTC Bulletin Board where, after reissuing the decision, FINRA found that applicant met the requirements for being listed); *W.C.W. W. Canada Water Enters., Inc.*, 50 S.E.C. 134, 135 (1989) (dismissing as moot applicant’s appeal of

FINRA's denial of an application for listing on NASDAQ where the applicant qualified for listing shortly after filing its appeal).

C. Giles' Arguments that this Appeal is Not Moot Are Meritless

Giles argues that this appeal is not moot because even though he is no longer statutorily disqualified based upon the California Order (which is the sole subject of this appeal), he remains disqualified by virtue of the order entered by Kentucky. He further asserts that this appeal includes the issues raised in the Kentucky Appeal.

Although Giles is correct that he remains disqualified because of the revocation order entered by Kentucky, Kentucky's order is *not* at issue in this appeal. Giles' motion to consolidate this appeal with the Kentucky Appeal, which FINRA opposed, has not been granted (and Giles' request, now that he is no longer disqualified based upon the California Order, makes even less sense now than it did when Giles sought such relief). Moreover, the Commission expressly stated that the issues raised in the Kentucky Appeal were not before it in this appeal, which is the same position that FINRA took in July 2021 when it filed its opposition brief in this appeal. The Kentucky Appeal is therefore separate and distinct from this appeal, and the fact that Giles has not obtained all licenses previously revoked by Kentucky has no bearing on this appeal and his status as a formerly disqualified individual by virtue of the California Order. Nor does the existence of the Kentucky Appeal somehow resuscitate an issue in this appeal for which the Commission can grant Giles relief.

Giles also argues that this appeal is not moot because FINRA will purportedly require him to inaccurately characterize on his Form U4 the license revocations imposed by the California Order as a bar (versus a revocation). Giles posits that the characterization of the California Order on his Form U4 as a state regulator's order barring him from engaging in

insurance activities presents a reviewable issue because this will purportedly cause information available to the public via BrokerCheck to inaccurately reflect that he was barred pursuant to the California Order.<sup>4</sup>

The Commission should reject Giles' baseless arguments for several reasons. First, any future characterization of the California Order on Giles' Form U4 (and thus the reporting of these orders in FINRA's BrokerCheck system) is not appealable under Exchange Act Section 19(d). *See* 15 U.S.C. § 78s(d) (providing that the Commission may review an SRO action that imposes a final disciplinary sanction, denies membership or participation to any applicant, prohibits or limits any person in respect to access to services offered by such organization or member thereof, or bars any person from becoming associated with a member). The FINRA action for which Giles seeks relief—potentially requiring him to amend his Form U4—does not fall under any of the four bases for Commission review under Exchange Act Section 19(d). Consequently, Giles' argument that this appeal is not moot because the Commission can issue him a favorable ruling concerning his Form U4 is misplaced and cannot serve as a basis to keep this appeal alive.

Indeed, under similar circumstances, the Commission found that it lacked jurisdiction to review FINRA's characterization of an order in BrokerCheck. *See Wanger*, 2016 SEC LEXIS

---

<sup>4</sup> “FINRA maintains BrokerCheck as part of its statutory obligation under Section 15A(i) of the Exchange Act to ‘establish and maintain a system for collecting and retaining registration information’ about registered broker-dealers and to make such information available to the public. ‘Registration information’ includes information about ‘disciplinary actions, regulatory, judicial, and arbitration proceedings.’” *Eric David Wanger*, Exchange Act Release No. 79008, 2016 SEC LEXIS 3770, at \*4-5 (Sept. 30, 2016). FINRA Rule 8312 “requires FINRA to make publicly available in BrokerCheck information about former associated persons . . . if they were the subject of a ‘final regulatory action’ that has been reported to CRD on a uniform registration form (including Form U6).” *Id.* at \*5.

3770, at \*10-17. In *Wanger*, the applicant sought to set aside FINRA’s characterization of a Commission order on BrokerCheck because FINRA allegedly mischaracterized the sanction imposed by the order. *Id.* at \*8. The Commission held that none of the four bases for jurisdiction under Exchange Act Section 19(d) existed and it dismissed *Wanger*’s appeal. *Id.* at \*10-11. Here, Giles does not specify any basis for the Commission to review a potential future action by FINRA to make him amend his Form U4, and none exists under Exchange Act Section 19(d). The relief Giles seeks from the Commission is indistinguishable from the relief sought in *Wanger* and cannot serve as a basis to keep this appeal alive.

Second, even if the characterization of the California Order on BrokerCheck presented an appealable issue to review under Exchange Act Section 19(d) (which it does not), Giles’ BrokerCheck report currently lists the sanction imposed by the California Order as a revocation and not as a bar. See <https://brokercheck.finra.org/individual/summary/2041288>. Thus, Giles is not an “aggrieved person” because there is not currently an issue with Giles’ BrokerCheck report that could potentially be remedied. See 15 U.S.C. § 78s(d)(2) (providing that a “person aggrieved” by any action specified in Exchange Act Section 19(d)(1) may seek review of such action); *Sec. Indus. and Fin. Mkts. Ass’n*, Exchange Act Release No. 72182, 2014 SEC LEXIS 1686, at \*25 (May 16, 2014) (“To pursue an application for review under Exchange Act Section 19(d)(2), among other things, an applicant must be a ‘person aggrieved’ by SRO action identified in Section 19(d)(1).”).

Instead, Giles seeks relief from the Commission akin to an injunction against potential future action by FINRA, which the Exchange Act does not contemplate.<sup>5</sup> See 15 U.S.C. § 78s(e)

---

<sup>5</sup> Indeed, FINRA’s rules set forth a process pursuant to which Giles may contest any future characterization of the California Order on BrokerCheck. See FINRA Rule 8312.

(providing that the Commission may affirm, modify, or set aside any sanction imposed in connection with a final disciplinary sanction or may remand the matter); 15 U.S.C. § 78s(f) (providing that in connection with the Commission's review of the denial of membership or participation in an SRO to any applicant, the barring of any person, or the prohibition or limitation of any person with respect to access to an SRO's services, the Commission shall dismiss the proceeding or set aside the SRO's action and require it to admit such applicant to membership or participation, permit such person to become associated with a member, or grant such person access to services offered by the SRO or member thereof); *see also Beatrice J. Feins*, 51 S.E.C. 918, 922 n.14 (1993) (rejecting applicant's request for monetary damages and stating that "we are not authorized under statute to award damages"); *Marshall Fin., Inc.*, 57 S.E.C. at 877 n.21 (holding that Exchange Act Section 19 does not appear to authorize setting aside FINRA fee assessment or remission of fees); *Robert M. Ryerson*, Exchange Act Release No. 57839, 2008 SEC LEXIS 1153, at \*17-18 (May 20, 2008) (holding that the Commission does not have the authority to stay FINRA collection efforts).

Third, even if a basis for review existed under the Exchange Act (which it does not) and BrokerCheck characterized the sanction imposed by the California Order as a bar (which it does not), as set forth herein and in the briefs filed by FINRA in this appeal there is nothing inaccurate about characterizing as a bar the sanctions imposed by the California Order. The practical effect of the California Order was to prohibit Giles from engaging in specific insurance activities, which the Commission has held constitutes a bar and renders an individual disqualified under the Exchange Act and FINRA's By-Laws. *See, e.g., Meyers Assocs., L.P.*, 2017 SEC LEXIS 3096, at \*15-16. The California Order indisputably did so until Giles re-obtained his revoked licenses.

#### **IV. CONCLUSION**

For all of these reasons, FINRA urges the Commission to dismiss Giles' appeal as moot, as it no longer presents an issue for which the Commission may grant him favorable relief.

Respectfully submitted,

/s/ Andrew Love  
Andrew Love  
Associate General Counsel  
FINRA  
1735 K Street, NW  
Washington, DC 20006  
(202) 728-8281  
andrew.love@finra.org  
nac.casefilings@finra.org

June 6, 2022

**CERTIFICATE OF COMPLIANCE**

I, Andrew Love, certify that this brief complies with the Commission's Rules of Practice by filing a brief that omits or redacts any sensitive personal information described in Rule of Practice 151(e).

/s/ Andrew Love  
Andrew Love  
Associate General Counsel  
FINRA  
1735 K Street, NW  
Washington, DC 20006  
(202) 728-8281  
andrew.love@finra.org  
nac.casefilings@finra.org

Dated: June 6, 2022

**CERTIFICATE OF SERVICE**

I, Andrew Love, certify that on this 6<sup>th</sup> day of June 2022, I caused a copy of the foregoing Additional Brief Concerning Mootness, Administrative Proceeding File No. 3-20267, to be filed through the SEC's eFAP system and to be served by electronic mail on:

Niels P. Murphy, Esq.  
Lawton R. Graves, Esq.  
Murphy & Anderson, P.A.  
1501 San Marco Blvd.  
Jacksonville, Florida 32207  
904-598-9282 (phone)  
nmurphy@murphyandersonlaw.com  
lgraves@murphyandersonlaw.com

/s/ Andrew Love  
Andrew Love  
Associate General Counsel  
FINRA  
1735 K Street, NW  
Washington, DC 20006  
(202) 728-8281  
andrew.love@finra.org  
nac.casefilings@finra.org