

UNITED STATES OF AMERICA  
before the  
SECURITIES EXCHANGE COMMISSION

*In the Matter of the Application of*

PAUL H. GILES, CRD# 2041288

Admin. Proc. File No. 3-20267

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**MOTION TO DISMISS APPLICATION FOR REVIEW**

FINRA has determined that Paul Giles is no longer subject to statutory disqualification as defined in Section 3(a)(39) of the Securities Exchange Act of 1934.<sup>1</sup> Accordingly, Mr. Giles moves to dismiss the pending Application for Review. FINRA does not oppose Mr. Giles's motion. In support, Mr. Giles states as follows:

1. On March 24, 2021, FINRA issued Mr. Giles' employing firm a notice informing the firm that it had determined that Mr. Giles was statutorily disqualified on the basis of the Decision and Default Order of Revocation filed by the California Department of Insurance. On May 6, 2021, FINRA provided additional notice that Mr. Giles was subject to two additional disqualifying events; the Order Revoking License filed by the Commonwealth of Kentucky Department of Insurance and the Order Revoking License filed by the State of Washington Office of Insurance Commissioner.

2. On April 21, 2021, Mr. Giles filed the instant appeal with the Commission seeking review of FINRA's determination that he was statutorily disqualified.

3. During the April 20, 2021 – July 8, 2022 time period, Mr. Giles reapplied for and was issued insurance licenses in California, Kentucky, and Washington. Accordingly, Mr. Giles is

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<sup>1</sup> Attached as **Exhibit A** is a July 12, 2022 letter from FINRA notifying Mr. Giles that the statutory disqualification is no longer in effect.

now licensed to conduct insurance business in every state where his license was previously revoked.

4. On the basis of foregoing, on July 12, 2022, FINRA informed Mr. Giles that it had determined that Mr. Giles is no longer statutorily disqualified.

5. Counsel for Mr. Giles has conferred with counsel for FINRA, and counsel for FINRA does not oppose the relief requested herein.

WHEREFORE, Mr. Giles requests that the SEC dismiss the pending Application for Review with each party to bear its own attorney fees and costs and for such further relief as is just and proper.

**MURPHY & ANDERSON, P.A.**

BY: s/ Lawton R. Graves  
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*Attorneys for Paul Giles*

July 15, 2022

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished to the following via the email and the SEC portal this 15<sup>th</sup> day of July, 2022:

Vanessa Countryman, Secretary  
Securities Exchange Commission  
Via eFAP

and by email on:

Andrew Love  
Associate General Counsel  
FINRA  
1735 K Street, NW  
Washington, DC 20006  
andrew.love@finra.org  
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s/ Lawton R. Graves  
Attorney

# EXHIBIT A



July 12, 2022

Via Email to [REGULATORY.AFFAIRS@AMPF.COM](mailto:REGULATORY.AFFAIRS@AMPF.COM)

Lauren Holmes  
Ameriprise Financial Services, LLC  
5221 Ameriprise Financial Center  
Minneapolis, MN 55474

Re: Paul Giles, CRD # 2041288

Dear Lauren Holmes,

By letters dated March 24, 2021 and May 6, 2021, you were notified that Paul Giles (“Mr. Giles”) was subject to statutory disqualification as defined in Section 3(a)(39) of the Securities Exchange Act of 1934. The disqualification arose as a result of the: 1) Default Decision and Order of Revocation filed by the State of California Department of Insurance, File No. LBB 5008-AP, dated September 8, 2009, in which Mr. Giles' licenses and licensing rights were revoked, effective October 8, 2009; 2) Order Revoking License filed by the Commonwealth of Kentucky Department of Insurance, DOI No. 677280, File No. 2010-0009, dated January 11, 2010, in which Mr. Giles' license was revoked and may also include findings of fraudulent, manipulative and deceptive conduct, and 3) Order Revoking License filed by the State of Washington Office of Insurance Commissioner, Case No. 10-0154, dated August 13, 2010, in which Mr. Giles' license was also revoked, effective September 2, 2010.

Upon receipt of notification that Mr. Giles' licenses have been reinstated in the states of California, Kentucky, and Washington, FINRA has determined that the above referenced events no longer subject Mr. Giles to a statutory disqualification as defined in Section 3(a)(39) of the Securities Exchange Act of 1934.

Should you have any questions regarding the revision to Mr. Giles' CRD record, please contact me at 240-386-5193.

Sincerely,

*Pascalie Goddard*

Pascalie Goddard  
Credentialing, Registration, Education and Disclosure (CRED)  
FINRA

cc: AnnMarie McGarrigle, FINRA

Christine Kolber, FINRA

Patricia Delk-Mercer, FINRA

Investor protection. Market integrity.

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OS Received 07/15/2022

Glynnis Kirchmeier, FINRA

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