Ronald Moschetta



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OFFICE OF THE SECRETARY

То:

FINRA Office of Dispute Resolution 1735 K Street NW Washington, DC 20006

And

U.S. Securities and Exchange Commission

100 F Street NE Washington, DC 20549

Subject: Request for Review and Removal of Permanent Bar Under FINRA Rule 2080 or Other Applicable Avenues

Dear Sir/Madam,

I am writing to formally request a review of the permanent bar imposed on my record in 2013 by FINRA, which has severely restricted my ability to work in the financial sector. This bar, often referred to as a "bad actor" designation, has had profound and unjust impacts on my career and livelihood. It has prevented me from assisting entrepreneurs seeking funding and public listings—a skill set I have cultivated over decades and one that I believe could greatly contribute to the market.

Background and Events Leading to the Bar

During the time in question, I was employed at **Strasburger**, **Pearson**, **Tolson**, **Wolf Inc.**, a long-standing member firm. I served as a stockbroker and investment banker, collaborating with the firm's principals on various deals, including a transaction known as **Marina Acquisitions One**.

This deal was extensively audited:

- 1. NASD (now FINRA) conducted an audit during the organization's transition.
- 2. The SEC also reviewed the deal.
- 3. A subsequent audit by FINRA's New York branch followed.

In all three instances, **no-action letters were issued**, confirming the integrity of the transaction. The Marina Acquisitions escrow account, which held \$3 million, was verified,

and all investors received their funds back in full. Importantly, there were no customer complaints filed regarding this deal.

Circumstances Beyond My Control

Unfortunately, while I was still with the firm, rogue brokers took disruptive actions that destabilized the business:

- They locked management, including myself, out of the facilities, confiscated firm files, and moved these documents to an undisclosed location. Despite documented attempts, these records were never recovered.
- FINRA was promptly notified of these events, and I took every reasonable step to address the situation.

In the aftermath, I was appointed CEO of the firm and attempted to stabilize operations by relocating the company to Long Island, New York. However, during the financial crisis, FINRA's Long Island office initiated a **fourth inquiry into Marina Acquisitions One**, requesting documents that were no longer available due to the actions of the rogue brokers.

While I cooperated fully and provided all the information in my possession, the Long Island office declined to consider the findings from the prior audits. They pursued arbitration, where I represented myself **pro se** without legal counsel. Despite my efforts to present the facts, the arbitration panel imposed a **permanent bar** and included a disclosure on my CRD record citing "\$3 million in missing funds." This perplexes me to this day, as all funds from Marina Acquisitions were returned to investors, as verified in multiple prior audits.

Impact of the Bar and Request for Relief

This bar has profoundly impacted my ability to work in the financial sector, depriving me of the opportunity to apply my skills in assisting entrepreneurs and clients. It has also significantly affected my ability to provide for my family. I am requesting:

- 1. **Expungement under FINRA Rule 2080** or any applicable rule, based on the following:
 - The allegations were factually incorrect and unsupported by prior audits.
 - There is no evidence of misconduct or investor harm.
- 2. **A full review of the circumstances** by both FINRA and the SEC to address this injustice.

I fully acknowledge the importance of maintaining high ethical standards in the financial industry, and I have always strived to act transparently and in the best interests of my clients. I believe this bar was imposed as a result of circumstances beyond my control, compounded by my inability to retain legal representation during arbitration.

I stand ready to cooperate in any way necessary to assist your review, including providing testimony or participating in interviews. I respectfully ask that you consider this appeal

and take the appropriate steps to remove this designation, which I feel does not accurately reflect my ethics or professional conduct.

Thank you for your time and consideration. I am hopeful that this matter can be resolved fairly, allowing me to contribute once again to the financial industry.

Sincerely, Ronald Moschetta CRD #1100365