

110. In 2016, five other Purported Purchasers deposited their IMMIG shares with broker-dealers located outside of the United States. Lawler's law firm credit card was authorized to be charged for the deposit fees for four of these deposits.

8. The Purported Purchasers Who Lawler Assisted Sell IMMIG Shares as Part of a Promotional Campaign Designed to Artificially Inflate the Share Price

111. IMMIG began trading on September 14, 2015. Over the following year, IMMIG traded on only 20 days, from prices ranging from \$0.15 to \$0.42, and average volume on days traded of only 2,617 shares.

112. Beginning in late January 2017, the trading volume for, and the price of, IMMIG shares rose on trading that did not coincide with any public news or corporate announcement.

113. Beginning on March 25, 2017, until the trading was suspended on April 4, 2017, there was a concerted promotional campaign tied to a press release issued by IMMIG after market close on March 27, 2017.

114. For example, on March 25, 2017, a penny stock promotional website, Stock Promotion Website A, referred email subscribers to an upcoming stock tip. On March 27, 2017, Stock Promotion Website A sent another email stating, in part, "IMPORTANT ALERT: MY STOCK TIP OF THE YEAR IS COMING UP TOMORROW. READ NOW!" This email further stated, "I'm about to send you my special report tomorrow morning at some time between 9 AM and 10 AM EST."

115. On March 27, 2017, IMMIG issued a press release stating, in part, that its immunotherapy had "successfully passed early toxicology and efficacy studies" in mice and that the results would help the company "move forward with [their] conversations with the FDA." On this day, 64,600 IMMIG shares traded.

116. On March 28, 2017, Stock Promotion Website A sent an email stating, in part, “This biotech [IMMG] may be on the cusp of getting FDA approval for its cancer therapies.” This reference to “cusp of getting FDA approval” was, at a minimum, materially misleading. IMMG had in its March 27 press release announced only that it had had some success with mice and hoped to move forward in “conversations” with the FDA, and a press release it issued on January 6, 2017 made clear that no applications with the FDA were even pending and that IMMG had only “plans to file for the FDA’s IND program for approval into Phase 1 human trials in mid-2018.”

117. Between March 28, 2017 and April 3, 2017, Stock Promotion Website A sent at least an additional ten promotional emails to their subscriber list similarly touting IMMG.

118. On March 28, 2017, Stock Promotion Website B sent an email stating, in part, “IMMG seems to be on the verge on [sic] curing cancer according to its latest press release.” This statement was, at a minimum, materially misleading given the public information contained in IMMG’s press releases described above. Stock Promotion Website B sent additional emails similarly touting IMMG on, at least, March 29 and April 4, 2017.

119. On March 28, 2017, Stock Promotion Website C sent an email stating, in part, “This biotech may be on the cusp of getting FDA approval for its cancer therapies.” Stock Promotion Website C sent at least one additional email touting IMMG that same day and on April 3, 2017.

120. Between March 28 and April 3, 2017, IMMG’s average daily volume was 1,771,165, with a low of \$0.40 and a high of \$1.62.

121. The Commission suspended trading in IMMG on April 4, 2017.

122. By then, shares held in the name of Chen and Lin had been sold into the promotional campaign for proceeds of approximately \$1.9 million and attempts were made to quickly move those proceeds out of the United States.

123. These unregistered sales of IMMIG shares, during a materially misleading promotional campaign, to unsuspecting public investors who were deprived of the knowledge that they were buying shares controlled by company insiders, were made possible by Lawler's fraudulent opinion letters opining that the stock could be traded without a registration statement and by Lawler's other efforts facilitating Client A and the Client A Group's purchase of the IMMIG shares.

124. On April 26, 2017, the Commission filed *SEC v. Lin*, No. 17 Civ. 3054 (S.D.N.Y.), charging them with violations of Section 5 of the Securities Act, and obtained an order freezing the assets held in the names of Chen and Lin. On August 25, 2017, after Chen and Lin failed to appear, a default judgment was entered that, among other things, ordered disgorgement.

125. Before these assets were frozen, \$95,000 of the proceeds from these sales of IMMIG stock were transferred out of the United States and ultimately went to an entity that also received funds from other promotional campaigns that artificially inflated prices of companies that the Client A Group had acquired, with Lawler's assistance, including BRKO discussed below. This account was used to make additional payments to Lawler's law firm for unidentified reasons.

9. The Sales of IMMIG Shares Were Not Registered

126. There was no registration statement filed or in effect with the Commission with respect to any of the sales of EPCC shares from the named S-1 Shareholders to the Purported Purchasers.

127. There was no registration statement filed or in effect with the Commission in connection with any of the sales of IMMG shares from Lin and Chen to the public.

128. There was no registration statement filed or in effect with the Commission in connection with the named S-1 Shareholder's sale of shares of EPCC to Entity A or in connection with Entity A's sale or offer to sell those shares.

D. BRKO

1. Formation and S-1 Issuance of Shares

129. BRKO was incorporated by its then CEO ("BRKO Individual 1") on December 19, 2014 as a gym fitness apparel company. A second individual ("BRKO Individual 2") was involved in the sale of BRKO and its shares.

130. BRKO issued restricted stock to certain individuals, including BRKO Individual 1, on or about December 18, 2014. BRKO also filed a Form S-1 registration statement with the Commission, effective on May 8, 2015, to register the public sale of certain of its stock. Although BRKO stated in its filings with the Commission that it was not a shell company, it had only nominal operations and nominal assets.

131. After the registration statement became effective, BRKO purportedly sold shares pursuant to this registration to 27 United Kingdom-based individuals (also the "named S-1 Shareholders").

132. However, as with IMMG, these individuals were not bona fide purchasers. They either were unaware that shares had been purportedly "sold" to them or were straw purchasers of shares that were always under the control of the issuer or its affiliates.

133. For example, Individual 1 admitted in representations he made to FINRA that he and BRKO's CFO solicited all of the named S-1 shareholders and that all these individuals were his friends and family.

134. Bank records reflect that six of these 27 named S-1 Shareholders received funds matching the share purchase price from an unknown source shortly before they transferred funds for the purported purchases. And at least one of the named S-1 Shareholders received from BRKO Individual 2 money that was used to fund the purchase.

135. In addition, no stock certificates were sent to these 27 individuals for their purported purchases. Instead, they were all sent to a single address associated with BRKO Individual 1, evidence that this stock was under the control of the issuer's control person.

136. This indicates that the owners of BRKO, as with IMMIG, engaged in a sham sale of shares to the named S-1 shareholders for the specific purpose of creating "unrestricted" shares that they in fact still controlled and which they could then resell together—along with the remaining shares of the company—to a shell company buyer, such as Client A and the Client A Group.

137. As discussed below, there is further evidence that the named S-1 Shareholders were not bona fide purchasers and that their shares were always under the control of the issuer, which would render those shares restricted.

2. Bannister Begins to Assist in the Sale of BRKO

138. On August 20, 2015, BRKO became DTC eligible. Later the same day, BRKO Individual 2 contacted Bannister by email and introduced her to BRKO Individual 1, who in turn emailed Bannister ostensibly asking for her help in obtaining capital to expand BRKO's business and get its products to America. In his initial email to Bannister, BRKO Individual 1 also claimed that several of the S-1 shareholders were looking to sell some of their shares and asked if she could help. This was part of a paper trail designed to hide the fact that BRKO Individuals 1 and/or 2 were in fact seeking to sell 100% of the shares of the company in a single transaction.

139. Bannister said that she could help and sent BRKO Individual 1 a draft fee agreement stating that BRKO was retaining Bannister to “find lenders and borrow \$500,000” that “will be used to fund operating requirement (sic) to increase production of clothing line.” The fee agreement further provided that BRKO would pay Bannister an upfront \$1,500 non-refundable retainer and thereafter a fee of 5% of loan proceeds she helped them obtain. However, instead of focusing on locating a lender for BRKO, Bannister immediately took steps to enhance BRKO’s ability to be marketed for sale to those interested in acquiring a public shell company.

140. Specifically, on August 24, 2015, Bannister emailed the named S-1 shareholder supposedly interested in selling some of her shares and told her that she thought she had a buyer for a portion of her shares. Within days, Bannister agreed to purchase 5,000 shares from the named S-1 shareholder for \$500.00. Bannister financed her “purchase” of these shares from the \$1,500 “fee” she had been paid by BRKO Individual 1 and she deposited the shares with a broker (“Broker 2”). Bannister subsequently admitted that she purchased those shares so that she could deposit them at a broker-dealer and ensure that BRKO could maintain its DTC eligibility. Bannister thereby enhanced BRKO’s marketability to a shell buyer.

141. The named S-1 Shareholder had purportedly paid \$.004 per share for each of her shares. 5,000 shares at that price would be only \$20.00. When questioned by Commission staff, Bannister could not explain how it was agreed that she would pay \$500.00 to purchase 5,000 shares of BRKO, but she admitted that she did not negotiate the sale price or number of shares to be bought with the named S-1 Shareholder. Instead, she said it was likely she discussed the price and amount with BRKO Individual 2.

3. Lawler Begins to Represent the Client A Group in Purchase of BRKO

142. On September 14, 2015, Lawler began to communicate with Bannister about the

sale of BRKO to Client A. Three days later, Lawler sent Bannister a term sheet for the sale of 100% of the shares of BRKO (including the 5,000 shares that Bannister herself held in her Broker 2 securities account) for a total purchase price of \$385,000. Lawler listed a “Paul Lee” as the representative of the purchasers of the shares, even though all of his known communications regarding the purchase were with Client A. There is no known evidence that any “Paul Lee” was involved in the purchase. Bannister testified that she does not know anyone named Paul Lee and has never communicated with him, despite her being a signatory to the term sheet with him. The term sheet did not specify or break out the price to be paid to the named S-1 shareholders for their shares and the price to be paid to the insiders for their restricted shares.

4. Lawler and Bannister Engage in Fraudulent Purchase and Deposit of BRKO Shares with a Broker-Dealer

143. Lawler told Bannister that Client A wanted proof that a second broker-dealer would accept BRKO shares for deposit before Client A would go forward with the deal. Client A’s insistence on proof that the unregistered shares that were ostensibly to be sold to the Purported Purchasers could be accepted as unrestricted by a broker-dealer was an indication to Bannister and Lawler that the Client A Group were acquiring the shares with intent to sell.

144. On September 15, 2015, Lawler introduced Bannister to a contact he had at Broker 4, advising the broker-dealer that Bannister wanted to deposit shares, even though she had no BRKO shares to deposit at that time because the only BRKO shares she held were already on deposit with Broker 2. Approximately one hour later, Lawler informed Bannister that he would send her the funds—“whatever [Broker 4] needs”—for the deposit.

145. Approximately two hours after that, despite not yet having any additional shares, Bannister told Broker 4 via email that she had BRKO shares that she wanted to deposit.

146. Approximately eight minutes after Bannister’s email to Broker 4, the same named

S-1 Shareholder from whom Bannister had already purchased 5,000 shares emailed Bannister offering to sell her an additional 5,000 BRKO shares. Bannister knew when she received this email that it was not a mere coincidence, and she subsequently admitted that she believed the offer was orchestrated by BRKO Individual 2. Bannister agreed to the “purchase” the following day, September 16, by email.

147. Bannister knew that she was not legitimately purchasing the shares because these shares would need to be returned to Client A or someone under his control on the completion of the deal, so that 100 % of BRKO shares could be sold to the Client A Group. In fact, after the deal closed, Lawler and Bannister attempted to transfer the shares to another individual at Client A’s direction, as set forth in more detail below.

148. On September 24, 2015, Lawler wired Bannister \$1,600 to pay for and deposit these shares, noting in the wire, “fees to cover deposit of shares of Broke Out.” Lawler also invoiced Client A for \$1,600, describing the debit from the trust account as “Withdrawal Fees to cover deposit of shares of Broke Out.” Bannister paid the named S-1 Shareholder the next day by wire. Despite this, the paperwork for the sale of these shares, including the stock purchase agreement signed by Bannister and the named S-1 shareholder, and the transfer agreement signed by BRKO Individual 1, were backdated to September 15, 2015, the day on which Lawler introduced Bannister to Broker 4 and she falsely represented that she had shares to deposit.

5. Bannister and Lawler Submit Fraudulent Documents, and Make Fraudulent Misrepresentations and Omissions, to the Broker–Dealer

149. Bannister submitted the stock purchase agreement, which she knew to be fraudulent, to Broker 4 to convince it to accept her BRKO shares for deposit and for trading to the public. As set forth below, Lawler referred to this stock purchase agreement, which he knew to be fraudulent, in his opinion letter to Broker 4 to convince it to accept Bannister’s BRKO

shares for deposit and for trading to the public.

150. Broker 4 asked Bannister to make certain representations as part of its regular due diligence designed to give Broker 4 comfort that it was not participating in an unregistered distribution of securities. On September 24, 2015, Bannister stated in writing to Broker 4 that she did not “have any relationship with the issuer or its subsidiaries” and that she had not and would not “make any payment to any person or entity in connection with [her] proposed sale of [BRKO shares].” She also signed a statement that she owned the shares and that they were “acquired in a bona fide and legal transaction.”

151. Broker 4 and its clearing firm sought additional information from Bannister as to how she knew the named S-1 Shareholder and BRKO Individual 1. Bannister falsely stated in an email that she “came upon” BRKO and contacted BRKO Individual 1 when doing “some research on clothing lines.” She also falsely stated, “I did not earn a fee [from BRKO], I am not an affiliate of the Company, nor will I be paid for this by the Company.”

152. Each of the referenced statements by Bannister to Broker 4 was knowingly false. Bannister learned of BRKO through BRKO Individual 2, who was searching for a buyer for the company; she did have a relationship with the issuer because she had agreed to assist it in obtaining capital in return for a commission and had already been paid a \$1,500 non-refundable fee; she was obviously engaged in assisting BRKO to sell 100% of its shares to the Client A Group; and she stood to earn \$10,000 for her services if the company was sold, which was the sale she was trying to facilitate by depositing the shares at Broker 4.

153. Bannister’s representation that she would not make any payment to anyone in connection with her sale of those shares was also false and/or misleading. If she were to sell those shares, she would have to return the proceeds of those sales to the person who had funded

her purchase or to someone he directed the payment to.

154. In fact, Bannister subsequently paid back to an account controlled by Lawler the proceeds from her sale of this stock.

155. Further, as Bannister well knew given her experience in this industry, the required representation that she would not “make any payment to any person or entity in connection with [her] proposed sale of [BRKO shares]” was intended to assure Broker 4 that she was not a straw owner acting on behalf of an undisclosed true owner who she would have to pay back once the shares were sold. Yet, Bannister knew she was a straw owner.

156. Bannister did not own the shares, given that she had been provided money by Lawler to purchase the shares. And she had not acquired the shares in a bona fide transaction but rather had acquired them on behalf of a third party whom had funded the purchase and expected the shares to be transferred to him as part of the 100% percent sale of all BRKO shares. Indeed, Bannister subsequently admitted that the shares were not really hers and that “it was a purchase, yes, but I was doing it for someone.”

157. Broker 4 further requested a legal opinion explaining the “[n]ature of this overall transaction” and “[c]onsideration paid.” Lawler drafted the opinion letter and sent it to Broker 4 on October 12, 2015. Lawler falsely stated that Bannister had purchased the shares on September 15, 2015, which he knew to be misleading because Bannister had not even been offered the shares by the named S-1 Shareholder at the time on September 15 when she told the broker-dealer she had shares to deposit.

158. Lawler also opined that Bannister was “able to freely sell the Stock,” which he knew, or was reckless in not knowing, was false because, among other facts, he knew that Bannister was not a bone fide purchaser of the BRKO shares; that the purchase was funded by

in concert, have violated and, unless restrained and enjoined, will continue to violate Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)].

SECOND CLAIM FOR RELIEF

**Violation of Section 10(b) of the Exchange Act and Rule 10b-5
Both Defendants)**

199. The Commission realleges and incorporates by reference herein each and every allegation contained in paragraphs 1 through 195 of this Complaint.

200. From in or about February 2015 through January 2018, Lawler, and from in or about August 2015 through March 2016, Bannister, directly or indirectly, singly or in concert, by use of the means or instrumentalities of interstate commerce, or of the mails, or of the facilities of a national securities exchange, in connection with the purchase or sale of securities:

(a) employed devices, schemes and artifices to defraud; (b) made untrue statements of material fact, or omitted to state material facts necessary in order to make statements made, in light of the circumstances under which they were made, not misleading; and (c) engaged in transactions, acts, practices and courses of business which operated or would have operated as a fraud or deceit upon any person.

201. By reason of the foregoing, Lawler and Bannister, directly or indirectly, singly or in concert, have violated and, unless restrained and enjoined, will continue to violate Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 [17 C.F.R. § 240.10b-5] thereunder.

THIRD CLAIM FOR RELIEF

**Violations of Sections 5(a) and (c) of the Securities Act
Both Defendants)**

202. The Commission realleges and incorporates by reference herein each and every allegation contained in paragraphs 1 through 195 of this Complaint.

203. From in or about February 2015 through January 2018, Lawler, and from in or about August 2015 through March 2016, Bannister, directly or indirectly, and notwithstanding the fact that there was no applicable exemption: (a) made use of the means and instruments of transportation or communication in interstate commerce or of the mails to sell, through the use or medium of a prospectus or otherwise, securities as to which no registration statement was in effect; and (b) made use of the means and instruments of transportation or communication in interstate commerce or of the mails to offer to sell, through the use or medium of a prospectus or otherwise, securities as to which no registration statement had been filed. No valid registration statement was filed with the Commission or in effect with respect to the offers and sales of securities of BRKO for which Bannister and Lawler were necessary participants and/or substantial factors, and no valid registration statement was filed with the Commission or in effect with respect to the offers and sales of securities of EPCC/IMMG for which Lawler was a necessary participant and/or substantial factor.

204. These offers and sales of BRKO and EPCC/IMMG securities took place in the United States in that: (a) sales were executed by broker-dealer firms in the United States; (b) irrevocable liability with respect to sales was incurred in the United States; and (c) title with respect to sales passed in the United States.

205. By reason of the foregoing, Lawler and Bannister, directly or indirectly, singly or in concert, have violated and, unless restrained and enjoined, will continue to violate Section 5 of the Securities Act [15 U.S.C. § 77e(a) and (c)].

FOURTH CLAIM FOR RELIEF

Violations of Sections 9(a)(1) and 9(a)(2) of the Exchange Act (Lawler)

206. The Commission realleges and incorporates by reference herein each and every

allegation contained in paragraphs 1 through 195 of this Complaint.

207. From in or about December 2016 through January 2018, Lawler, directly or indirectly, singly or in concert, by use of the mails or any means or instrumentality of interstate commerce, or of any facility of any national securities exchange or any member of a national securities exchange:

- a) For the purpose of creating a false or misleading appearance of active trading in any security other than a government security, or a false or misleading appearance with respect to the market for any such security: (1) effected transactions in such security which involved no change in beneficial ownership thereof; or (2) entered an order or orders for the purchase or sale of such security with the knowledge that an order or orders of substantially the same size, at substantially the same time, and at substantially the same price, for the sale or purchase of any security, had been or was to be entered by or for the same or different parties; or
- b) Effected, alone or with one or more other persons, a series of transactions in any security other than a government security or in connection with any security-based swap agreement with respect to such security creating actual or apparent active trading in such security, or raising or depressing the price of such security, for the purpose of inducing the purchase or sale of such security by others.

208. By reason of the foregoing, Lawler, directly or indirectly, singly or in concert, violated, and unless enjoined and restrained will continue to violate, Section 9(a) of the Exchange Act [15 U.S.C. § 78i(a)].

PRAYER FOR RELIEF

WHEREFORE, the Commission respectfully requests that the Court grant the following relief:

I.

Permanently restrain and enjoin Defendants, their agents, servants, employees and attorneys and all persons in active concert or participation with them, who receive actual notice of the injunction by personal service or otherwise, and each of them, from future violations of Section 17(a) of the Securities Act [15 U.S.C. § 77q(a)]; Section 10(b) of the Exchange Act [15 U.S.C. § 78j(b)] and Rule 10b-5 [17 C.F.R. § 240.10b-5] thereunder; and, with respect to Lawler, Section 9(a) of the Exchange Act [15 U.S.C. §§ 78i(a)].

II.

Order Defendants to disgorge all ill-gotten gains obtained as a result of the violations alleged in this Complaint, as well as prejudgment interest thereon.

III.

Order Defendants to pay civil money penalties pursuant to Section 20(d) of the Securities Act [15 U.S.C. § 77t(d)] and Section 21(d)(3) of the Exchange Act [15 U.S.C. § 78u(d)(3)], in amounts to be determined by the Court.


IV.

Order such other and further relief as this Court deems just and proper.

JURY DEMAND

Pursuant to Rule 39 of the Federal Rules of Civil Procedure, Plaintiff demands for this case to be tried to a jury.

Dated: July 12, 2019
New York, New York

By: 

Marc P. Berger
Lara S. Mehraban
Steven G. Rawlings
Kevin P. McGrath
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Exhibit A
Chart of NINK Trading

Name	Type	Date	Execution Time	Execution Quantity	Execution Price	Order Date	Order Time	Order Price	Order Quantity
NINK Trader	SELL	12/19/2016	3:49:44 PM	1,000	\$0.51	12/16/2016	12:34:01 PM	\$0.51	2,000
Int'l Securities Holding Corp. / Lawler	BUY	12/19/2016	3:49:44 PM	1,000	\$0.51	12/19/2016	3:49:31 PM	\$0.51	1,000
NINK Trader	SELL	12/20/2016	11:45:22 AM	3,000	\$0.51	12/16/2016	12:34:01 PM	\$0.51	6,000
Int'l Securities Holding Corp. / Lawler	BUY	12/20/2016	11:45:23 AM	3,000	\$0.51	12/20/2016	11:44:56 AM	\$0.51	3,000
NINK Trader	SELL	12/20/2016	2:18:56 PM	2,500	\$0.40	12/20/2016	2:18:14 PM	\$0.40	2,500
Int'l Securities Holding Corp. / Lawler	BUY	12/20/2016	2:18:56 PM	2,500	\$0.40	12/20/2016	11:53:15 AM	\$0.40	2,500
NINK Trader	SELL	12/21/2016	12:19:03 PM	2,500	\$0.45	12/21/2016	11:52:14 AM	\$0.45	5,000
Int'l Securities Holding Corp. / Lawler	BUY	12/21/2016	12:19:04 PM	2,500	\$0.45	12/21/2016	12:18:53 PM	\$0.42	5,000
NINK Trader	SELL	12/21/2016	12:42:35 PM	2,500	\$0.45	12/21/2016	11:52:14 AM	\$0.45	5,000
Int'l Securities Holding Corp. / Lawler	BUY	12/21/2016	12:42:35 PM	4,000	\$0.45	12/21/2016	12:42:00 PM	\$0.45	2,500
NINK Trader	SELL	12/22/2016	10:47:25 AM	2,500	\$0.47	12/22/2016	9:31:51 AM	\$0.47	5,000
Int'l Securities Holding Corp. / Lawler	BUY	12/22/2016	10:47:25 AM	2,500	\$0.47	12/22/2016	10:47:13 AM	\$0.47	2,500
NINK Trader	SELL	12/22/2016	11:48:07 AM	5,000	\$0.47	12/22/2016	11:46:49 AM	\$0.47	5,000
Int'l Securities Holding Corp. / Lawler	BUY	12/22/2016	11:48:07 AM	5,000	\$0.47	12/22/2016	11:04:04 AM	\$0.47	5,000
NINK Trader	SELL	12/22/2016	11:52:59 AM	5,000	\$0.50	12/22/2016	11:43:23 AM	\$0.50	5,000
William S. Lawler Joint Account	BUY	12/22/2016	11:52:59 AM	5,000	\$0.50	12/22/2016	11:52:47 AM	\$0.50	5,000

Name	Type	Date	Execution Time	Execution Quantity	Execution Price	Order Date	Order Time	Order Price	Order Quantity
NINK Trader	SELL	12/23/2016	11:12:57 AM	10,000	\$0.50	12/23/2016	11:12:48 AM	\$0.50	10,000
Int'l Securities Holding Corp. / Lawler	BUY	12/23/2016	11:12:57 AM	10,000	\$0.50	12/23/2016	11:11:28 AM	\$0.50	10,000
NINK Trader	SELL	12/23/2016	3:46:18 PM	10,000	\$0.50	12/23/2016	3:46:09 PM	\$0.50	10,000
Int'l Securities Holding Corp. / Lawler	BUY	12/23/2016	3:46:19 PM	10,000	\$0.50	12/23/2016	11:20:20 AM	\$0.50	10,000
NINK Trader	SELL	12/27/2016	9:45:31 AM	10,000	\$0.50	12/27/2016	9:45:20 AM	\$0.50	10,000
Int'l Securities Holding Corp. / Lawler	BUY	12/27/2016	9:45:32 AM	10,000	\$0.50	12/27/2016	9:17:05 AM	\$0.50	10,000
NINK Trader	SELL	12/27/2016	11:35:51 AM	10,000	\$0.50	12/27/2016	11:35:40 AM	\$0.50	10,000
Int'l Securities Holding Corp. / Lawler	BUY	12/27/2016	11:35:51 AM	10,000	\$0.50	12/27/2016	11:04:07 AM	\$0.50	10,000
NINK Trader	SELL	12/27/2016	11:50:08 AM	5,000	\$0.55	12/23/2016	2:37:17 PM	\$0.55	5,000
Int'l Securities Holding Corp. / Lawler	BUY	12/27/2016	11:50:09 AM	5,000	\$0.55	12/27/2016	11:49:25 AM	\$0.55	5,000
NINK Trader	SELL	12/27/2016	3:51:14 PM	5,000	\$0.55	12/27/2016	12:07:29 PM	\$0.55	10,000
Int'l Securities Holding Corp. / Lawler	BUY	12/27/2016	3:51:14 PM	5,000	\$0.55	12/27/2016	3:49:47 AM	\$0.55	5,000
NINK Trader	SELL	12/28/2016	3:37:02 PM	10,000	\$0.55	12/28/2016	9:28:05 AM	\$0.54	10,000
Int'l Securities Holding Corp. / Lawler	BUY	12/28/2016	3:37:02 PM	10,000	\$0.55	12/28/2016	3:35:46 PM	\$0.55	10,000
NINK Trader	SELL	12/29/2016	11:02:51 AM	5,000	\$0.55	12/27/2016	12:07:29 PM	\$0.55	10,000
Int'l Securities Holding Corp. / Lawler	BUY	12/29/2016	11:02:52 AM	5,000	\$0.55	12/29/2016	11:02:29 AM	\$0.55	30,000
NINK Trader	SELL	1/3/2017	11:32:36 AM	20,000	\$0.60	1/3/2017	11:34:10 AM	\$0.59	20,000
Int'l Securities Holding Corp. / Lawler	BUY	1/3/2017	11:32:36 AM	20,000	\$0.60	1/3/2017	11:31:07 AM	\$0.60	20,000

Name	Type	Date	Execution Time	Execution Quantity	Execution Price	Order Date	Order Time	Order Price	Order Quantity
NINK Trader	SELL	1/4/2017	3:23:20 PM	5,000	\$0.70	1/4/2017	3:09:45 PM	MKT	20,000
Int'l Securities Holding Corp. / Lawler	BUY	1/4/2017	3:23:20 PM	5,000	\$0.70	1/4/2017	3:23:10 PM	\$0.70	5,000
NINK Trader	SELL	1/5/2017	12:29:58 PM	5,000	\$0.70	1/5/2017	10:00:44 AM	MKT	20,000
William S. Lawler	BUY	1/5/2017	12:29:58 PM	5,000	\$0.70	1/5/2017	12:29:50 AM	\$0.70	5,000
NINK Trader	SELL	1/11/2017	10:18:41 AM	10,000	\$0.70	1/11/2017	8:44:52 AM	\$0.70	10,000
Int'l Securities Holding Corp. / Lawler	BUY	1/11/2017	10:18:42 AM	10,000	\$0.70	1/11/2017	10:18:29 AM	\$0.70	20,000
NINK Trader	SELL	1/13/2017	10:15:48 AM	5,000	\$0.70	1/13/2017	9:36:00 AM	MKT	20,000
Int'l Securities Holding Corp. / Lawler	BUY	1/13/2017	10:15:48 AM	5,000	\$0.70	1/13/2017	10:07:46 AM	\$0.70	5,000
NINK Trader	SELL	1/17/2017	12:33:46 PM	7,542	\$0.70	1/17/2017	9:15:44 AM	MKT	20,000
Int'l Securities Holding Corp. / Lawler	BUY	1/17/2017	12:33:46 PM	7,542	\$0.70	1/17/2017	12:31:18 PM	\$0.70	10,000
NINK Trader	SELL	1/24/2017	9:30:09 AM	10,000	\$0.75	1/24/2017	9:30:07 AM	\$0.70	20,000
Int'l Securities Holding Corp. / Lawler	BUY	1/24/2017	9:30:09 AM	10,000	\$0.75	1/23/2017	2:13:42 PM	\$0.70	5,000
NINK Trader	SELL	1/24/2017	9:50:40 AM	5,000	\$0.70	1/24/2017	9:30:07 AM	\$0.70	20,000
Int'l Securities Holding Corp. / Lawler	BUY	1/24/2017	9:50:40 AM	5,000	\$0.70	1/23/2017	2:14:20 PM	\$0.75	10,000
NINK Trader	SELL	1/24/2017	12:38:48 PM	5,000	\$0.70	1/24/2017	9:30:07 AM	\$0.70	20,000
Int'l Securities Holding Corp. / Lawler	BUY	1/24/2017	12:38:48 PM	5,000	\$0.70	1/24/2017	10:39:57 AM	\$0.70	10,000
NINK Trader	SELL	1/25/2017	2:36:10 PM	15,000	\$0.70	1/25/2017	9:26:01 AM	\$0.70	20,000
Int'l Securities Holding Corp. / Lawler	BUY	1/25/2017	2:36:10 PM	15,000	\$0.70	1/25/2017	1:21:03 PM	\$0.70	15,000

Name	Type	Date	Execution Time	Execution Quantity	Execution Price	Order Date	Order Time	Order Price	Order Quantity
NINK Trader	SELL	2/3/2017	11:29:50 AM	1,000	\$0.80	2/3/2017	11:29:49 AM	\$0.80	20,000
Int'l Securities Holding Corp. / Lawler	BUY	2/3/2017	11:29:50 AM	1,000	\$0.80	2/3/2017	11:29:28 AM	\$0.80	5,000
NINK Trader	SELL	3/1/2017	9:56:24 AM	10,000	\$0.82	2/3/2017	11:29:49 AM	\$0.80	20,000
Int'l Securities Holding Corp. / Lawler	BUY	3/1/2017	9:56:24 AM	10,000	\$0.82	3/1/2017	9:54:29 AM	\$0.85	20,000
NINK Trader	SELL	3/1/2017	11:10:34 AM	10,000	\$0.85	3/1/2017	11:07:53 AM	\$0.85	20,000
Int'l Securities Holding Corp. / Lawler	BUY	3/1/2017	11:10:35 AM	10,000	\$0.85	3/1/2017	9:54:29 AM	\$0.85	20,000
NINK Trader	SELL	3/15/2017	11:33:39 AM	8,500	\$0.94	3/15/2017	11:14:13 AM	\$0.94	10,000
Int'l Securities Holding Corp. / Lawler	BUY	3/15/2017	11:33:39 AM	8,500	\$0.94	3/15/2017	11:30:36 AM	\$0.94	10,000
NINK Trader	SELL	3/15/2017	11:40:56 AM	1,500	\$0.94	3/15/2017	11:14:13 AM	\$0.94	10,000
Int'l Securities Holding Corp. / Lawler	BUY	3/15/2017	11:40:56 AM	1,500	\$0.94	3/15/2017	11:40:44 AM	\$0.94	1,500
NINK Trader	SELL	3/15/2017	12:05:08 PM	2,500	\$0.98	3/15/2017	12:00:59 PM	\$0.98	10,000
Int'l Securities Holding Corp. / Lawler	BUY	3/15/2017	12:05:09 PM	2,500	\$0.98	3/15/2017	12:04:59 PM	\$0.98	2,500
NINK Trader	SELL	3/22/2017	3:59:00 PM	2,100	\$0.98	3/15/2017	12:00:59 PM	\$0.98	10,000
Int'l Securities Holding Corp. / Lawler	BUY	3/22/2017	3:59:00 PM	2,100	\$0.98	3/17/2017	9:37:56 AM	\$0.98	2,500
NINK Trader	SELL	3/27/2017	11:13:12 AM	1,000	\$0.96	3/27/2017	10:58:14 AM	\$0.95	10,000
Int'l Securities Holding Corp. / Lawler	BUY	3/27/2017	11:13:12 AM	1,000	\$0.96	3/27/2017	11:12:59 AM	\$0.96	7,500
NINK Trader	SELL	3/27/2017	11:14:38 AM	5,600	\$0.96	3/27/2017	10:58:14 AM	\$0.95	10,000
Int'l Securities Holding Corp. / Lawler	BUY	3/27/2017	11:14:38 AM	5,600	\$0.96	3/27/2017	11:12:59 AM	\$0.96	7,500

Name	Type	Date	Execution Time	Execution Quantity	Execution Price	Order Date	Order Time	Order Price	Order Quantity
NINK Trader	SELL	3/27/2017	11:20:33 AM	2,500	\$0.96	3/27/2017	10:58:14 AM	\$0.95	10,000
Int'l Securities Holding Corp. / Lawler	BUY	3/27/2017	11:20:33 AM	2,500	\$0.96	3/27/2017	11:20:14 AM	\$0.96	3,000
Int'l Securities Holding Corp. / Lawler	BUY	3/27/2017	3:20:13 PM	1,000	\$0.97	3/27/2017	3:19:54 PM	\$1.01	2,500
NINK Trader	SELL	3/27/2017	3:20:13 PM	1,000	\$0.97	3/27/2017	11:27:02 AM	\$1.00	10,000
NINK Trader	SELL	3/27/2017	3:21:25 PM	100	\$1.00	3/27/2017	3:27:02 AM	\$1.00	100
Int'l Securities Holding Corp. / Lawler	BUY	3/27/2017	3:21:25 PM	100	\$1.00	3/27/2017	3:19:54 PM	\$1.01	2,500
NINK Trader	SELL	3/27/2017	3:21:26 PM	1,500	\$1.01	3/27/2017	11:27:02 AM	\$1.00	10,000
Int'l Securities Holding Corp. / Lawler	BUY	3/27/2017	3:21:26 PM	1,400	\$1.01	3/27/2017	3:19:54 PM	\$1.01	2,500
NINK Trader	SELL	3/27/2017	3:23:38 PM	5,000	\$1.01	3/27/2017	11:27:02 AM	\$1.00	10,000
Int'l Securities Holding Corp. / Lawler	BUY	3/27/2017	3:23:38 PM	5,000	\$1.01	3/27/2017	3:23:22 PM	\$1.01	9,000
Int'l Securities Holding Corp. / Lawler	BUY	3/27/2017	3:25:32 PM	2,400	\$1.01	3/27/2017	3:23:22 PM	\$1.01	9,000
NINK Trader	SELL	3/27/2017	3:25:32 PM	2,400	\$1.01	3/27/2017	11:27:02 AM	\$1.00	10,000
NINK Trader	SELL	3/27/2017	3:35:27 PM	500	\$1.01	3/27/2017	11:27:02 AM	\$1.00	10,000
Int'l Securities Holding Corp. / Lawler	BUY	3/27/2017	3:35:27 PM	500	\$1.01	3/27/2017	3:23:22 PM	\$1.01	9,000
NINK Trader	SELL	3/28/2017	3:11:38 PM	5,250	\$1.10	3/27/2017	4:15:12 PM	\$1.10	10,000
Int'l Securities Holding Corp. / Lawler	BUY	3/28/2017	3:11:39 PM	5,250	\$1.10	3/28/2017	3:11:01 PM	\$1.01	7,000
NINK Trader	SELL	3/29/2017	11:16:02 AM	4,750	\$1.10	3/27/2017	4:15:12 PM	\$1.10	10,000
Int'l Securities Holding Corp. / Lawler	BUY	3/29/2017	11:16:03 AM	4,750	\$1.10	3/29/2017	11:15:37 AM	\$1.01	6,000

Name	Type	Date	Execution Time	Execution Quantity	Execution Price	Order Date	Order Time	Order Price	Order Quantity
NINK Trader	SELL	3/30/2017	9:57:25 AM	10,000	\$1.25	3/30/2017	8:35:57 AM	\$1.25	10,000
Int'l Securities Holding Corp. / Lawler	BUY	3/30/2017	9:57:26 AM	10,000	\$1.25	3/30/2017	9:56:55 AM	\$1.25	12,500
NINK Trader	SELL	3/30/2017	10:45:08 AM	1,000	\$1.35	3/30/2017	10:28:37 AM	\$1.35	1,000
Int'l Securities Holding Corp. / Lawler	BUY	3/30/2017	10:45:08 AM	1,000	\$1.35	3/30/2017	10:44:46 AM	\$1.50	3,000
NINK Trader	SELL	3/30/2017	10:57:52 AM	1,900	\$1.50	3/30/2017	10:53:05 AM	MKT	5,000
Int'l Securities Holding Corp. / Lawler	BUY	3/30/2017	10:57:52 AM	1,900	\$1.50	3/30/2017	10:44:46 AM	\$1.50	3,000
NINK Trader	SELL	4/4/2017	9:36:20 AM	5,000	\$1.20	4/4/2017	9:25:00 AM	MKT	5,000
Int'l Securities Holding Corp. / Lawler	BUY	4/4/2017	9:36:20 AM	5,000	\$1.20	4/4/2017	9:31:22 AM	\$1.25	5,000
NINK Trader	SELL	4/4/2017	9:53:15 AM	2,000	\$1.50	4/4/2017	9:39:43 AM	MKT	5,000
Int'l Securities Holding Corp. / Lawler	BUY	4/4/2017	9:53:15 AM	2,000	\$1.50	4/4/2017	9:52:59 AM	\$1.50	2,000
NINK Trader	SELL	4/4/2017	10:43:45 AM	2,000	\$1.75	4/4/2017	9:39:43 AM	MKT	5,000
Int'l Securities Holding Corp. / Lawler	BUY	4/4/2017	10:43:45 AM	2,000	\$1.75	4/4/2017	10:42:05 AM	\$1.75	2,000
NINK Trader	SELL	5/15/2017	1:08:45 PM	1,000	\$2.05	5/3/2017	11:14:13 AM	\$2.05	5,000
Int'l Securities Holding Corp. / Lawler	BUY	5/15/2017	1:08:45 PM	1,000	\$2.05	5/15/2017	1:08:26 PM	\$2.05	1,000
NINK Trader	SELL	5/16/2017	11:05:31 AM	2,700	\$2.05	5/3/2017	11:14:13 AM	\$2.05	5,000
Int'l Securities Holding Corp. / Lawler	BUY	5/16/2017	11:05:31 AM	2,700	\$2.05	5/16/2017	11:05:13 AM	\$2.05	2,700
William S. Lawler	SELL	6/5/2017	9:31:54 AM	500	\$2.00	6/5/2017	9:31:54 AM	\$2.00	500
Int'l Securities Holding Corp. / Lawler	BUY	6/5/2017	9:31:54 AM	500	\$2.00	6/4/2017	6:52:06 PM	\$2.15	2,000

Name	Type	Date	Execution Time	Execution Quantity	Execution Price	Order Date	Order Time	Order Price	Order Quantity
William S. Lawler	SELL	6/5/2017	9:31:56 AM	500	\$2.10	6/5/2017	9:31:56 AM	\$2.10	500
Int'l Securities Holding Corp. / Lawler	BUY	6/5/2017	9:31:56 AM	500	\$2.10	6/4/2017	6:53:06 PM	\$2.15	2,000
NINK Trader	SELL	7/10/2017	3:12:02 PM	900	\$2.19	5/26/2017	10:00:36 AM	\$2.19	5,000
Int'l Securities Holding Corp. / Lawler	BUY	7/10/2017	3:12:02 PM	900	\$2.19	7/10/2017	3:11:45 PM	\$2.19	900
NINK Trader	SELL	7/11/2017	12:57:43 PM	36	\$2.30	5/26/2017	10:00:36 AM	\$2.19	5,000
NINK Trader	SELL	7/11/2017	12:57:43 PM	1,964	\$2.30	7/11/2017	10:35:38 AM	\$2.25	2,000
Int'l Securities Holding Corp. / Lawler	BUY	7/11/2017	12:57:43 PM	2,000	\$2.30	7/11/2017	12:57:29 PM	\$2.30	2,000
NINK Trader	SELL	8/1/2017	12:23:01 PM	1,000	\$2.30	7/13/2017	9:51:40 AM	\$2.30	3,000
Int'l Securities Holding Corp. / Lawler	BUY	8/1/2017	12:23:01 PM	1,000	\$2.30	8/1/2017	12:22:36 PM	\$2.30	1,000
NINK Trader	SELL	9/8/2017	2:35:10 PM	3,200	\$2.35	9/5/2017	10:51:24 AM	\$2.35	6098
Int'l Securities Holding Corp. / Lawler	BUY	9/8/2017	2:35:10 PM	3,200	\$2.35	9/8/2017	2:34:36 PM	\$2.35	3,800
NINK Trader	SELL	9/8/2017	3:15:45 PM	545	\$2.35	9/5/2017	10:51:24 AM	\$2.35	6098
Int'l Securities Holding Corp. / Lawler	BUY	9/8/2017	3:15:45 PM	545	\$2.35	9/8/2017	3:15:27 AM	\$2.35	600
NINK Trader	SELL	9/11/2017	12:08:41 PM	3,000	\$2.40	9/11/2017	12:02:59 PM	\$2.40	6,000
Int'l Securities Holding Corp. / Lawler	BUY	9/11/2017	12:08:41 PM	3,000	\$2.40	9/11/2017	12:06:46 PM	\$2.45	5,000
NINK Trader	SELL	9/18/2017	9:45:28 AM	1,997	\$2.35	9/13/2017	9:29:28 AM	\$2.35	5,000
Int'l Securities Holding Corp. / Lawler	BUY	9/18/2017	9:45:28 AM	1,997	\$2.35	9/18/2017	9:45:06 AM	\$2.35	2,000
NINK Trader	SELL	10/5/2017	3:27:30 PM	500	\$2.35	9/17/2017	9:29:28 AM	\$2.35	5,000
Int'l Securities Holding Corp. / Lawler	BUY	10/5/2017	3:27:30 PM	500	\$2.35	10/5/2017	3:27:09 PM	\$2.35	500

Name	Type	Date	Execution Time	Execution Quantity	Execution Price	Order Date	Order Time	Order Price	Order Quantity
NINK Trader	SELL	10/5/2017	3:58:01 PM	500	\$2.35	9/17/2017	9:29:28 AM	\$2.35	5,000
Int'l Securities Holding Corp. / Lawler	BUY	10/5/2017	3:58:01 PM	500	\$2.35	10/5/2017	3:57:49 PM	\$2.35	500
NINK Trader	SELL	10/23/2017	9:48:13 AM	500	\$2.35	10/23/2017	9:48:13 AM	\$2.35	5,000
Int'l Securities Holding Corp. / Lawler	BUY	10/23/2017	9:48:13 AM	500	\$2.35	10/23/2017	9:47:11 AM	\$2.35	500

JS 44 (Rev. 02/19)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

SECURITIES AND EXCHANGE COMMISSION

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Marc P. Berger, Securities and Exchange Commission, New York Regional Office, 200 Vesey Street, Suite 400, New York, New York 10281 (212) 336-1023

DEFENDANTS

WILLIAM SCOTT LAWLER and NATALIE BANNISTER

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known) Carl F. Schoeppl, Schoeppl Law, P.A. (Lawler); Richard Nummi, Nummi & Associates (Bannister)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question, 4 Diversity

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship and incorporation status.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large grid table for Nature of Suit with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, LABOR, IMMIGRATION, FORFEITURE/PENALTY, LABOR, LABOR, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District, 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 15 U.S.C. §§ 77e(a), (c), and 77q(a); 15 U.S.C. § 78j(b); and 17 C.F.R. § 240.10b-5. Brief description of cause: Securities Fraud and registration violations

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

7/2/19

SIGNATURE OF ATTORNEY OF RECORD

[Signature]

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

CERTIFICATION OF ARBITRATION ELIGIBILITY

Local Arbitration Rule 83.7 provides that with certain exceptions, actions seeking money damages only in an amount not in excess of \$150,000, exclusive of interest and costs, are eligible for compulsory arbitration. The amount of damages is presumed to be below the threshold amount unless a certification to the contrary is filed.

Case is Eligible for Arbitration

I, Marc P. Berger, counsel for plaintiff, do hereby certify that the above captioned civil action is ineligible for compulsory arbitration for the following reason(s):

- monetary damages sought are in excess of \$150,000, exclusive of interest and costs,
- the complaint seeks injunctive relief,
- the matter is otherwise ineligible for the following reason

DISCLOSURE STATEMENT - FEDERAL RULES CIVIL PROCEDURE 7.1

Identify any parent corporation and any publicly held corporation that owns 10% or more of its stocks:

RELATED CASE STATEMENT (Section VIII on the Front of this Form)

Please list all cases that are arguably related pursuant to Division of Business Rule 50.3.1 in Section VIII on the front of this form. Rule 50.3.1 (a) provides that "A civil case is "related" to another civil case for purposes of this guideline when, because of the similarity of facts and legal issues or because the cases arise from the same transactions or events, a substantial saving of judicial resources is likely to result from assigning both cases to the same judge and magistrate judge." Rule 50.3.1 (b) provides that " A civil case shall not be deemed "related" to another civil case merely because the civil case: (A) involves identical legal issues, or (B) involves the same parties." Rule 50.3.1 (c) further provides that "Presumptively, and subject to the power of a judge to determine otherwise pursuant to paragraph (d), civil cases shall not be deemed to be "related" unless both cases are still pending before the court."

NY-E DIVISION OF BUSINESS RULE 50.1(d)(2)

- 1.) Is the civil action being filed in the Eastern District removed from a New York State Court located in Nassau or Suffolk County? Yes No
- 2.) If you answered "no" above:
 - a) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in Nassau or Suffolk County? Yes No
 - b) Did the events or omissions giving rise to the claim or claims, or a substantial part thereof, occur in the Eastern District? Yes No
 - c) If this is a Fair Debt Collection Practice Act case, specify the County in which the offending communication was received:

If your answer to question 2 (b) is "No," does the defendant (or a majority of the defendants, if there is more than one) reside in Nassau or Suffolk County, or, in an interpleader action, does the claimant (or a majority of the claimants, if there is more than one) reside in Nassau or Suffolk County? Yes No

(Note: A corporation shall be considered a resident of the County in which it has the most significant contacts).

BAR ADMISSION

I am currently admitted in the Eastern District of New York and currently a member in good standing of the bar of this court.

Yes No

Are you currently the subject of any disciplinary action (s) in this or any other state or federal court?

Yes (If yes, please explain) No

I certify the accuracy of all information provided above.

Signature: 