

Carrie Devorah
PUBLIC INVESTOR 12-03894
TELLING INVESTMENT CLIENTS & INVESTMENT ADVISORS THINGS WARREN BUFFETT DOES NOT KNOW TO TELL THEM
THAT WALL STREET DOES NOT WANT EXPOSED

SEC Mail Processing

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Amendments to the Commission's Whistleblower Program Rules
File Number S7-16-18
Proposed Changes To:

Email To: rule-comments@sec.gov

OVERVIEW:

I read each of the 184 pages of the SEC staff Whistleblower Act update proposal.

I did.

The SEC staff was paid to write 184 pages of fan fiction. I am countering with a detailed response answered from experience and with actual documents. No apologies for its length. You get once chance to make that impression.

I did not give the SEC employee Keith Kanyan permission to share my contact details with anyone else. The next thing I knew was getting multiple calls from the SEC Investigators responsive to my cold call to the SEC that Keith Kanyan fielded. In fact, I told Kanyan I did not want to pursue anything until I figured out what the hell was going on. I received multiple calls from the SEC Philadelphia office Investigators. I became an SEC Requested Investment Client Whistleblower when the SEC Investigators pursued me to become their whistleblower, after I cold called the SEC to ask how one proves they hired a fee advisor when there is no contract.

The SEC '*curates*' cases to fit the story the SEC wants heard. Let me restate that. The SEC '*curates*' stories and pleadings the SEC needs being read to assure the SEC is not caught distorting fiction in to '*fact*' the SEC wants heard by Judges, legislators, Investing public, law enforcement and lawmakers.

The proposal reads like a bad game of Broken Telephone where one says something and the other person passes forward what they believe they heard so by the time the conversation gets to the end, the conversation is nothing at all with what the first repeated words were.

There is no coincidence of the SEC staff '*updating*' the Whistleblower Act. I began a public conversation exposing the SEC and the SEC Whistleblower office are cheating Whistleblowers of earned awards. I speak with my experience. I speak with my documents. I share what I see.

I was covering Warren Buffett testifying in the Senate hearings. Warren forgot his beat up bag under the Witness table in the Senate room. I raced down the hall to return Warren's bag to Warren. I bet all of Warren Buffett's billions to my buying Warren a replacement for that ratty

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tag on Warren's beat up bag. If Warren does know but never told the Oracle Of Wall Street's following what I am the whistleblower exposing on Wall Street's back story that *'Keeps Wall Street Criminal Criminaling On'* then...

By now I learned the SEC curates cases to cut out submitted party names, using that initially submitted information to form a new case, cutting the Whistleblower out of the award. The SEC aggregates the info for other cases, involved directly or indirectly. The SEC cuts whistleblowers out of awards intentionally.

The SEC knows too well by now my conversations, my documents I share make for change for Investment Clients and Investment Advisors and criminal justice reform for felons:

- (i) Congressman Keith Ellison's Act against forced arbitration Bill HR 1098. More information on the 'hail mary pass' Wall Street deceives Investment Clients with was learned by me after Ellison proposed his Bill. Bill HR 1098 as proposed is wrong.
- (ii) Rapid resignation of FINRA former CEO Linda Fienberg
- (iii) Rapid resignation of SEC former Commissioner Michael Piwowar
- (iv) with SEC employees lack of knowledge of the Whistleblower Experience coming across as survivors of Stockholm Syndrome¹. Whistleblower Rules as updated are no better for Citizen Whistleblowers then what is currently written.
- (v) SCOTUS decisions in EPIC SYSTEMS v LEWIS; SEC v LUCIA and SEC v BANDIMERE the SEC denied because it was a mirror of LUCIA. The former Freytag cite by FINRA is gone. One must take away the obstacle to let change continue
- (vi) Finding and publishing the papers confirming Madoff told the truth when Madoff said "they knew." "They" did, 50+ years ago. FINRA/NASD knew.

SEC knew. Morseo, the SEC knew that Bernard Madoff went in to the family business, 1960.
- (vii) One article I wrote was the way forward for former VA Governor Terry McCauliffe signature claim of restoring voting rights to felons after failing at his effort for as long as he jawed about it until I called his team post McCauliffe's failure in VA SCOTUS challenge by Judicial Watch. My article is idiot proof, a marketers term. Hundreds of thousands of VA felons are voting because of what Wall Street- the SEC and FINRA/NASD decided to teach me- a lesson. Yes, those exact words sit in the

¹ Stockholm syndrome is a condition that causes hostages to develop a psychological alliance with their captors as a survival strategy during captivity.

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FINRA official digital audio moment of Arbitration 12-03894, the Hot Mic moment by FINRA trained arbitrators Susan Mathews, TS Perlman and Ed Statland.

- (viii) Of course, there remains the still ongoing matter the SEC Philly based 'investigators' asked me to whistleblow on, chasing me, guilting me with 'someone has to do the right thing.' That is my moral fiber, my DNA, I have at times come to regret but once started, once unravelling one mess to find another yet another, I committed to seeing this through.

Facts are:

(i) Investment Advisors are not oversight of the SEC²

(ii) Investment Clients are not oversight of the SEC³

(iii) Investment Advisors and Investment Client issues go to Cops, Courts, JAMS and AAA⁴ not to the SEC or FINRA/NASD. How the hell could so many people over so many decades go along with this fraud without speaking up unless they did not know or care to know which means they are accountable for each and every con on consumers. That is who I care about, consumers, the Investment Client that me that became a victim. Until.... one day the SEC and FINRA/NASD went too far, with me.

This proposal is a sham coverup intended to force out credible whistleblowers, nothing more, nothing less. The only thing missing in all of this 184 pages is one letter, "e", "*shame.*" Lives are destroyed while SEC employees laugh as was the case with a phone call response to a FOIA request, because the staffer did not agree lives are at stake. It was just a few days prior, yet another Wall Street victim did a nose dive off a New York posh building.

I went from being an art school grad with an Associates Degree in to solving why Whistleblowers Awards are chiseled away at with a game of 3 card monty I remember from the streets of New York, the least person one would ever anticipate would work this until change is done, at least by my seeing me.

The SEC sat on credible information of 3 SEC securities Broker-Dealers plus Independent Contractors, co-owners, Independent Contractors and employees were named over the past 8+ years until one party got caught in a Waldorf bank breaking a Federal law.

One SEC ALJ Court witness Bradley Mascho was lead, with intent, by former SEC attorney Michael Rinaldi in to '*shaming*' me in his ALJ Court testimony available to the public to read. Rinaldi knew who I was, document submission after document submission after document submission since 2010 aiding the SEC shape their cases, yes, plural.

I laugh when I ask people I engage with on this matter '*now, who do you want to play you in the movie?*' Don't laugh. Every Madoff biopic that came out got it wrong, Madoff told the truth "they knew." Things can only improve globally, the reach of the SEC and FINRA/NASD MoUs,

² https://www.finra.org/arbitration-and-mediation/investment_advisers

³ https://www.finra.org/arbitration-and-mediation/investment_advisers

⁴ https://www.finra.org/arbitration-and-mediation/investment_advisers

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Memorandums of Understanding, with this story being told. Even living this story since 2014, with flashbacks to 1995 and 2010, I still don't believe that

- (i) I figured this out
- (ii) the more to be told
- (iii) that there are people wicked enough to intentionally conspire to hurt nice, innocent hard working people.

I come from a world of branding and design. One needs a sense of humor challenging scum colluding to feed off unsuspecting victims. My theme song I drive myself with when I flag is Miley Cyrus "*Wrecking Ball*." I brought together, in a loosely imaged team, other whistleblowers each with their own compelling story. my name, my avatar, I chose is "*Six Pack Sally Swinging At Low Hanging Fruit On Wall Street*," teamed up with Alpha Grunt, Sherloko, Anonymous, Mitre Box, Prudent Champion. There are more. I don't stand alone. I found community by leading a movement.

The SEC and FINRA/NASD made me in to the author of this comment today- the first every Investment Client found in Bad Faith for exposing truths Wall Street wants covered up. More change is underway I will talk about only after the change is done.

The SEC FOIA office reminds me they have responsibility to not abuse USG dollars. The dollars wasted by SEC employees keeping decades of Wall Street crimes going. The SEC failed to take action against Western International Securities, Western International Investment Advisor, JP Morgan Clearing and employees and Independent Contractors all of whom are overseen by the SEC. The SEC wasted dollars of other agencies I cross submitted papers to- IRS, USPIS, DOL, FTC, FCC, CFTC. The CFPB supposed to protect Investment Clients is a fail, too.

My notes on the 184 pages of the SEC staff whistleblower proposal. are aggregated below , telling, with firsthand expertise and documents, the story I am living. Not one page of the 184 pages of this Whistleblower Act update proposal includes real life experiences of Citizen Whistleblowers who put their everything on the line to do the right thing. Remember, I did not set out to whistleblow on the SEC and FINRA/NASD and their employees. I was recruited.

This is our jump off point, the collective failure of the SEC and other agencies, the still unknown victims of the Securities Broker-Dealers and Investment Advisors I got taken by, the still unknown amount of losses- factors that propel me to clean up Wall Street, one document exposure at a time.

Congress says you can clear my name. You refuse. I ask you again, clear my name.

Carrie Devorah, DTM
Public Investor 12-03894:
SEC Requested Investment Client Whistleblower Found In Bad Faith For Telling The Truth Wall Street Wants Covered Up

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BRIEF HISTORY OF MY BEGINNING AS A WHISTLEBLOWER:

I am Carrie Devorah, Public Investor 12-03894. Before I became Public Investor 12-03894, I was Public Investor 10-04856. Before that I was Public Investor 95-00217.

All three cases came to roost in FINRA DRS 12-03894. Defendants counsel the FBI call FBI Lawyer 1, raised those prior arbitrations against my character, alleging conclusions that were not quite what I remembered and, as since documented, not what took place. I was ill during the arbitration not stupid.⁵

95-00217: 100% recovery and then some, just not paid to me. The matter is shared with law enforcement, regulators and media. That is what whistleblowers do.

10-04856: An online client since 2002 with RBC, prior with Prudential, I did not learn until 5+ months post settling in FINRA/NASD where the Claim was led by Respondents, that my identity had been stolen by the RBC team even before I became an RBC client. Imagine looking at documents RBC provided in 2012, discovering your accounts were at RBC in February 2002 seven months before you signed to become an RBC client, August 2002. The matter is shared with law enforcement, regulators and media. That is what whistleblowers do.

12-03894: I walked away with almost all my principal then was forced to payout money to the Respondent whose lawyer was not licensed to argue law for pay in the District of Columbia. To reclaim my name, I took my conversation public. The matter is shared with law enforcement, regulators and media. That is what whistleblowers do.

The FINRA/NASD and SEC patterns in these crimes shaped before my eyes as I handled documents. I shared these patterns with law enforcement, regulators and online with my social media via LinkedIn www.linkedin.com/in/carriedevorah, Twitter @godingovt, Facebook and my website www.centerforcopyrightintegrity.com. That is what whistleblowers do.

FINRA/NASD and SEC patterns include stating 'you got your principal back so what did you lose' knowing that if Investment Client victims got their 'principal' back the profits are kept by the criminals.

By being an Investment Client in each of the 3 matters, I was able to also expose how client statements are manipulated, falsified, recreated; how holdings values are not consistent to their value of that market time frame ie. 'points' are shaved; matters how Investment Client documents are manipulated; how client accounts are kept open long after a client closes their account⁶ providing to law enforcement, regulators et al documents not often seen because these

⁵ https://www.dietsinreview.com/diet_column/01/freelance-white-house-photog-carrie-devorah-dropped-8-sizes-after-knee-injury-and-hip-replacement/

⁶ I received notice 2/2018 my self-managed Scottrade account was open 9 years after I closed the account. I reported to the DISB etc back programs were operating abusing client orders

Investment Client Complaints are taken away from Courts where adjudication is conducted secretly in FINRA/NASD hiding facts from public needing to be warned these crimes took place and with whose help- the lawyers, the arbitrators, the Securities Broker-Dealers, the s.r.o. employees knowing the rules and the SEC that has oversight.

There were, there are countless other victims of the same crimes I was unwittingly a victim, too, not knowing they are victims. They know the case their lawyer pled in the private, secret FINRA/NASD. Investment Client victims go to Courts.⁷

Cases pled in courts are archived. Documents remain accessible for decades+. FINRA/NASD and the SEC destroy documents 3-5 years in a secret forum. What is public for other victims, lawyers, regulators, legislators to read is finrabrokercheck.org pushed by Senator Ed Markey. FINRA/NASD banks in Massachusetts. FINRAbrokercheck is self written by the Industry Respondent without vetting.⁸

The Whistleblower staff want to put a dollar amount on what is paid to whistleblowers. There is not enough money in the world to compensate for every moment a whistleblower invests in to righting a wrong usually beginning from the Whistleblower's personal experience. Compound that with the shaming, the shunning, time lost that cannot be replaced, all because we caught the wrong someone else usually knew but wanted covered up.

Former RBC (10-04856) CEO John Taft testified to Barney Frank, former House majority FSC committee chair that even the brightest of CEOs could not do what Taft's people can do. Taft is right. Main Street goes to jail. Cops never hear about Wall Street. Despite signing a "*Truth in Testimony*", Taft did not tell the Committee RBC was under investigation for harming investors.

I was a news photographer sent to the hearing that morning to get headshots coincidental to battling with my former RBC Investment Advisor Scott Sangerman over monies I saw melt away before my eyes as the market crashed months prior. It was not until 2012 I learned my Investment Advisor refused to sell me out because my money was not in my accounts.

Usually in and out of hearings in 15 minutes, 10-6-2009, I stayed the whole of Panel 1. RBC CEO John Taft "*investor protection*"⁹ testimony¹⁰ under '*Truth in Testimony*' about RBC client experience was not my RBC Wealth Management client experience I was going through at that exact hour in time, corresponding with Taft's staff in Beverly Hills and Minnesota. Taft was testifying for SIFMA.¹¹ Taft said nothing to the FSC Committee about the multi state

⁷ https://www.finra.org/arbitration-and-mediation/investment_advisers

⁸ www.centerforcopyrightintegrity.com Please defer to my website for more on this topic, search Markey, search Warren, search Massachusetts⁸

⁹ <https://www.sec.gov/comments/265-25-02/265-25-02-6.pdf>

¹⁰ <https://www.sec.gov/comments/265-25-02/265-25-02-6.pdf>

¹¹ www.sifma.org

investigation¹² in to RBC CA and RR frauds on Investment Client accounts. 2013-2014, RBC under John Taft signed a multi-state agreement across the country settling the Investigation. I still cannot get a straight answer as to who initiated the multi-state investigation or where the settlement millions paid by RBC ended up being used in the states. The stolen millions are not restored back to the victims. In fact, States nor RBC told victims and prospective clients, between November 2008 of these crimes I would never have known about had it not been for the RBC attorney Carolyn Guy rubbing it in my face *'there is nothing you can do.'* Double Jeopardy. You can't sue twice for the same claim even if you were deceived in to the Securities Broker-Dealer only forum, signing Broker-Dealer not *'Special Submission'* papers.

The matter of SEC and FINRA/NASD abuse of NDAs and Wall Street creating Double Jeopardy by taking Investment Client victims and Investment Advisors in to FINRA/NASD DRS is shared with law enforcement, regulators and media. That is what whistleblowers do.

I had been an RBC client for 8+ years, a client of that RBC team for almost 10+ years. It was not until after 5+ months after the FINRA/NASD DRS, I was told Investment Client victims are party to, did I learn my identity had been stolen inside of RBC and JP Morgan.

RBC attorney Carolyn Guy sent me the Encrypted CD only after the RBC matter I knew about, failure to sell was settled. RBC would not provide me with statements responsive to my prior requests. My online RBC statements were wiped off line. 2013, I learned from the RBC Encrypted CD that JP Morgan employee, Bryan Gasche is named in the digital footprint, manipulating my RBC accounts within 3 weeks of my FINRA/NASD DRS arbitration. The manipulated RBC account statements show 100+ transfers back and forth between RBC and JP Morgan. JP Morgan confirmed 2014, I was not a JP Morgan Client.

The SEC, FINRA/NASD, regulators, law enforcement on the Federal level knew. That is what whistleblowers do.

Cops on the local level were unaware FINRA operates out of the District of Columbia, conducting DRS in DC in rented suites. I told them. I told them FINRA is the NASD with a name change only, both 100% owned by the New NASD Holdings. I told them that FINRA Dispute Resolution was not sanctioned by Congress yet operated out of the District of Columbia, disappearing from being registered with the DCRA until I made that public, too. The matter is shared with law enforcement, regulators and media. That is what whistleblowers do.

I shared forward what the cops told me of their experiences with Financial fraud. Cops are limited to crimes under their state or city laws on the books. There are not laws on the books, yet, for what I document. Cant change laws on crimes covered up for decades. That is what whistleblowers do. Whistleblowers quarterback change being made.

¹²

<https://disb.dc.gov/sites/default/files/dc/sites/disb/publication/attachments/RBCCapitalMarketsLLCAdmOrder011014.pdf>

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In time, whistleblowers realize they are telling the criminals how to cover up the cons. 'Things' of concern I wrote about would 'disappear' to this day. Criminals, cons, the SEC, FINRA/NASD read, too. Things only the SEC and FINRA/NASD knew were damaging were disappearing like Panel 1 of SIFMA 10-6-2009 hearing disappeared of the Archived hearing.

I let every staffer I had met and spoken personally to what was removed from the FSC archive. Panel 1 was restored. That chunky monkey in the well is me. Witnesses RBC John Taft, FINRA Rick Ketchum, NASAA and another are seated. Unaddressed is who on the FSC Committee tampered with the archive first removing then replacing Witness panel 1.

I let the SEC, FINRA/NASD, regulators, law enforcement know that FINRA/NASD indicated RBC Wealth Management was listed under both RBC Private Counsel USA and RBC Capital Markets and that RBC said in its annual SEC filing RBC Wealth Management was a trademark. I was an RBC Wealth Management client or so I thought, here, learning my life savings were with a Brand.

That is what Whistleblowers looking to clear their Bad Faith name when they told the truth do.

Soon, after I shared the printed papers, RBC Private Counsel 'changed' on finrabrokercheck. In and around that time, RBC was charged by the SEC with money laundering. My unfunded accounts showed IPOs, Options and KIDDS bought after my accounts were emptied but left open.

As for moving forward, I 'curated' information I would share especially with FINRA/NASD.

As if it cannot get worse looking, I stepped from RBC right in to what has become the 'model' through which I can explain, back to back experience like stereo, what the hell is going on, in real time with real papers, the stuff the SEC now wants to cover up more. There was a Social Security number ACAT rejection I did not understand until receiving the RBC encrypted CD in 2012.

WHISTLEBLOWER LEARNING CURVE TAKES PLACE GRADUALLY OVER TIME:

It has been quite the learning curve for me.^{13, 14} It would have been nice to win but the realized needed goal was to put papers otherwise covered up in FINRA/NASD in to the public record. I share with other Investment Client victims and Investment Advisor victims '*...it is not you, you did the right thing, you trusted, you believed....*' I share '*...it is them, a conspiracy we could never have anticipated...*' The failure is all the way up and down the Wall Street plumb line.

¹³ https://www.pacermonitor.com/public/case/3541718/SECURITIES_et_al_v_DEVORAH_et_al; FINRA 12-03894

¹⁴ https://www.pacermonitor.com/public/case/6561047/DEVORAH_v_ROYAL_BANK_OF_CANADA_et_al; Case ID 10-04856

Moreso, I caution Investment Client victims Yeah, the last people you want to trust is the lawyer stating your case goes in to FINRA/NASD for resolution.

A good honest lawyer knows all Investment Client and Investment Advisor claims go to Courts, JAMS and AAA.¹⁵

By keeping Investment Client and Investment Advisor claims out of Courts, the SEC and FINRA/NASD have groomed Judges and clerks for decisions favoring the Wall Streeters. Case in point, Western International Securities lawyer FBI Lawyer 1 suing me in Judge Ellen Huvelle's courtroom in DC District court, filing a case by a Securities Broker-Dealer against me alleging cause is "*Promissory Loan*."

"*Promissory Loan*" is the sham used by Securities Broker-Dealers to 'joinder' employees of the Securities Broker-Dealers 'cousin' the Investment Advisory firm, a completely different company, in to FINRA/NASD DRS to get the money the firm wants.

The Judges and Clerks need cleaning up to. SCOTUS decisions with Epic Systems v Lewis, SEC v LUCIA and Bandimere are a step towards addressing the SEC and FINRA/NASD frauds that have permeated the Courts.

In my whistleblower journey, Western International Securities filed their claim against me as a "*Promissory Loan*" because it was a Claim addressed in the FINRA/DRS that is for Securities Broker-Dealers only.

- (i) I am not industry. I am an Investment Client. There is/was no "*Promissory Loan*". There was a fraud perpetrated on the Court
- (ii) Judge Ellen Huvelle who 'signed' the Order was paralyzed out of state on that Order date, only able to move one toe according to the WAPO article of July 2015, almost 9 months later. The "*order*" was presented by FBI Lawyer 1 a lawyer not licensed in DC or the District Court.

We are not intended to know what happens after we give strangers Barrons¹⁶ boasts over all of the elements of Identity and Financial theft. They give us nothing of their identity- no income, no address, no Social Security number, nothing. The SEC implemented whistleblower award program, over the course of the years, not being transparent, has covered up the grounds upon which awards are made. In that the SEC has been overstepping the parameters set by Congress, Securities Broker-Dealer only, makes it clear the SEC is not competent to determine whether awards "*may be denied on relatively straightforward grounds because they do not implicate novel or important legal or policy questions...*"

FINRA/NASD slush fund¹⁷ to the Investor Protection Fund for lawyers arguing cases in the SEC and FINRA/NASD forums neither of which have authority for these cases, as I address later.

¹⁵ https://www.finra.org/arbitration-and-mediation/investment_advisers

¹⁶ <https://www.barrons.com/articles/SB124406321197382541>

¹⁷ <https://www.financial-planning.com/news/warren-piaba-call-for-finra-fund-to-pay-arbitration-awards>

The SEC has to be brought down a peg or two. The SEC has no authority to make policy let alone legal decisions, Congress does, moreso since the SEC has overstepped Congress parameter of what the SEC 'covers'... Securities Broker-Dealers only.

More detailed notes of my personal knowledge of the 184 Whistleblower Act proposal pages are aggregated below.

When whistleblowers look at papers, there is always something that pops out. I am concerned spotting the minutiae the SEC wants eyes to look at. I know in being a whistleblower what the SEC wants people reading the 184 pages to look at- what the SEC paints itself as which is what the SEC is not.

What stuck out to me reading about the Investor Protection Fund is knowing about the FINRA/NASD Education Fund and another SEC & FINRA/NASD slush fund being pushed by Senators Markey and Warren, their proposed Protection Fund to be for lawyers arguing cases in the SEC and FINRA/NASD forums wanting a payment pool.

- (i) FINRA/NASD banks in Warren/Markey's state
- (ii) FINRA/NASD is racking up money decisions for lawyers trafficking clients in to the FINRA DRS where neither Investment Clients and Investment Advisors go for claims adjudication¹⁸

The SEC Whistleblower Act update proposal agenda to silence whistleblowers is affirmed with statements the Proposal contains, such as, "*By permanently barring applicants that make frivolous or fraudulent award applications, proposed Rule 21F-8(e) could help free up staff resources that could be used to expedite the processing of potentially meritorious award applications as well as the payment of awards.*"

Employees time would be used well if SEC employees knew their jobs and did the work the employees are paid to do. Giving the SEC the ability to bar individuals "*from submitting whistleblower award applications*" the SEC deems "*are found to have submitted false*" allows the SEC to cover up more agency failures and more crimes by SEC overseen securities Broker-Dealers.

The SEC staff define Whistleblowing as "*...the information relates to a possible violation of the federal securities laws (including any law, rule, or regulation subject to the jurisdiction of the Commission) that has occurred, is ongoing, or is about to occur...*"

There is a problem how the SEC is currently operating against Whistleblowers.

The SEC is limited to taking action against Securities violations by Securities Broker-Dealers. The SEC is taking action against persons and entities that are not under SEC oversight but are under Law Enforcement, State and Local Law oversight. The SEC is covering up crimes to mitigate Securities Broker-Dealer exposure.

¹⁸ https://www.finra.org/arbitration-and-mediation/investment_advisers

Ponzi schemes are not SEC oversight even if the person alleges to victims the person is selling securities or investments.

I am stunned how this has gone ignored for so long. That said, one lawyer said to me *'it was easier.'* Another lawyer said *'...its where he makes a lot of money...'*

It is important to note the SEC has no statutory authority to propose and adopt a rule. The SEC can only do what Congress says it can do. Congress must authorize and approve even the SEC having staff work on the Whistleblower Proposal. The SEC cannot write policy. The SEC cannot abuse CRA as is being done.

The SEC Whistleblower Act update proposal states very important guidance the SEC has intentionally skirted and ignored, writing *"Supreme Court's admonition"* that *"Section 21F, as enacted by Dodd-Frank"* is *"a law concerned only with encouraging the reporting of '...securities law violations...'"*

Most recently the Supreme Court Justices decisions of EPIC v Lewis, SEC v Lucia, the Supreme Court Of The United States denying Bandimere, roiled SEC doing *'business as usual'* covering up securities Broker-Dealer crimes intent to contain fallout, intending to protect the Securities Broker-Dealers the SEC has oversight of, only, not Investment Advisors, not Investment Clients.

The SEC was getting away with *'financial murder'* of Investment Client victims and Investment Advisors.

Congress's use of the phrase *"administrative action"*, Section 21F, is clear. SEC is limited to considering whistleblower awards from investigations resolved through formal adjudicatory administrative proceedings. SEC has no authority for ALJ Courts although SEC has pretended to have for years. Crimes go to court. SEC taken in Broker-Dealer crimes to mitigate Broker-Dealer exposure. The Commission only began the Commission's *"enforcement cooperation program, forms of settlement agreements outside of the context of a judicial or administrative proceeding"* in 2010 *"as an alternative mechanism to resolve securities law violations."*

The SEC has, unfettered in the SEC reach, pursuing more than *'...securities law violations...'* SEC employees forget SEC employees are accountable to Cops. The SEC holds Main Street SEC and FINRA/NASD participants accountable. The SEC does not hold SEC employees, self-regulators and securities Broker-Dealers accountable to those same standards.

Congress wants to do the right thing. Between the *'right thing'* and Congress are the usual witnesses called to Congressional hearings- the NASD/FINRA, NASAA, PIABA, SIFMA, SIPC and others in that *'advocating pool.'*

Whistleblowers are the *'see something, say something'* extra eyes.

Carrie Devorah

PUBLIC INVESTOR 12-03894

TELLING INVESTMENT CLIENTS & INVESTMENT ADVISORS THINGS WARREN BUFFETT DOES NOT KNOW TO TELL THEM
THAT WALL STREET DOES NOT WANT EXPOSED

The updated Whistleblower Act must state at its beginning, first few lines

(i) SEC is a creation of Congress, created by Congress solely, only, exclusively to regulate Securities Broker-Dealers

(ii) SEC has oversight only of Securities Broker-Dealers

(iii) SEC has no oversight of Investment Advisors and Investment Clients

(iv) Investment Advisor complaints and financial crimes are reported to Law Enforcement not to the SEC and/or FINRA/NASD

(v) Investment Client victims complaints and financial crimes are reported to Law Enforcement not to the SEC and/or FINRA/NASD

The SEC is nothing about Investment Advisors and Investment Clients the SEC and FINRA/NASD recite in their mantra '*investor protection through regulating markets.*' More correctly the SEC and FINRA/NASD are about '*regulating markets by alleging investor protection.*'

The term "*whistleblower*" means any individual who provides, or 2 or more individuals acting jointly who provide, information relating to a violation of the securities laws to the Commission, in a manner established, by rule or regulation, by the Commission. Whistleblower status starts when an individual within the SEC asks accepts documents- digitally, by delivery or via the US Mails.

Whistleblowers must be compensated for doing good work whistleblowers risk doing, including SEC misusing resources and abusing funds, for example, sending SEC Requestors to NARA, National Archives Record Center, OGIS, Office of Government Information Services, a regulator tool to delay cases to the point of tolling/blowing statutes.

SEC employees don't do the work the SEC Whistleblower Act update proposal misleads is being done. SEC staff gets bonuses for crappy work and failures. The SEC curating information convenient to the story the SEC has to tell to '*present*' the image the SEC is compliant to laws Congress wrote is not only deceptive, it is criminal, misleading US Attorney Offices and Judges at the same time creating a false narrative in Court records at a cost to truth. But when another states Attorney General is told to stand down, there is a question of tampering.

2017, Congress signed the Whistleblowers Act, deciding, with the help of lawyers representing employee whistleblowers against federal employers that the only whistleblowers are Federal employees not Citizen Whistleblowers.¹⁹ *Individual*" in Section 21F(a)(6) whistleblower definition should state both "*citizen whistleblower*" and "*employee whistleblower*" not just Federal employee. The update change that must happen is within the SEC agency.

¹⁹ Congress in 2015 established a new motor-vehicle-safety whistleblower award program that allows employees or contractors of a motor-vehicle manufacturer, parts supplier, or dealership who report serious violations of federal vehicle-safety laws to obtain awards of 10 percent to 30 percent of any monetary sanction over \$1 million that the Federal Government collects based on that information.

2011, the SEC stated "*Congress primarily intended our program 'to motivate those with inside knowledge to come forward and assist the Government to identify and prosecute persons who have violated the securities laws' has become a way to 'smoke out' information that may harm Securities Broker-Dealer members of the FINRA/NASD, friends, past or present, of the SEC.*

It is appropriate to amend Rule 21F-2 to propose Rule 21F-2(a) will give a uniform definition for whistleblower status to include citizen whistleblowers along with Federal Employees and their "*award eligibility, confidentiality protections, and anti-retaliation protections...*"

Some of the things written in the 184 page missive are mind boggling. Whistleblowers are reporting on issues the SEC and its appointed s.r.o. self regulatory organizations failed to catch. If the SEC had caught the crimes, there would be nothing for the Whistleblower to whistleblow on.

Commissioner Kara Stein nailed the SEC at the recent Sunshine meeting. The sole Commission "*No*" vote on the SEC staff 1000+ page "*Best Interest*" proposal, Kara reminded the online and in person audience that day, Wall Street began with the two line Buttonwood Tree agreement, facetious two lines morphed in to 1000 pages SEC staff proposed that day, two lines versus the 184 pages proposed here for the Whistleblower proposed changes.

24 salesmen, stock brokers, outside of 68 Wall Street, signed a 2 provision agreement,

"... We the Subscribers, Brokers for the Purchase and Sale of the Public Stock, do hereby solemnly promise and pledge ourselves to each other, that we will not buy or sell from this day for any person whatsoever, any kind of Public Stock, at a less rate than one quarter percent Commission on the Specie value and that we will give preference to each other in our Negotiations. In Testimony whereof we have set our hands this 17th day of May at New York, 1792..."

The 24 signers would

- (1) deal only with each other eliminating auctioneer
- (2) keep commissions at 0.25%

Modern day regulators might call this '*restraint of trade*' or '*price fixing.*'

Decades later, Wall Street still shares a '*group hug.*' It is called "*Brokers Protocol*" keeping the "*it*" within the family. Investment Clients are Wall Street punts back and forth.

Kicking these puppies are the Wall Street business leagues bastardizing the words '*investor protection*' in to red flags diverting attention from what Wall Street does not want seen such as the I.P.F. Investor Protection Fund which I have not heard of from the SEC in 8+ years of more victims.

Another impetus for the Whistleblower proposal may have been me. I figured out how the SEC is cheating Whistleblowers.

I am a Citizen Whistleblower. Citizen Whistleblower not covered by the Senate Whistleblower Act Chuck Grassley takes pride in. Citizen Whistleblowers are of no interest to lawyers wanting the 'deep pockets' whistleblower employers provide. Citizen Whistleblowers are of a unique breed. Citizen Whistleblowers not receiving protections from Chuck Grassley's Act are harmed.

I was harmed.

I am SEC requested Investment Client whistleblower, Public Investor 12-03894, the only Investment Client you will meet found in Bad Faith for telling truths Wall Street wants covered up.

Jaques Houssou, MBA FCMI, an SEC whistleblower was harmed. Houssou says "...I am basically a whistleblower because of my integrity and sense of purpose, I always take action when its the right thing to do when I am faced with indifference..." Houssou told the SEC about Pedro Fort Berbel's international crimes, 3+ years ago. The SEC did not advise Houssou the SEC does not report crimes to Cops. The SEC covered up Berbel's crimes inside the SEC. Houssou, after becoming a victim of Pedro Fort Berbel, became a private Investigator, FL License # 1700227.

In my 8+ years of more victims by the Investment Advisors, Securities Broker-Dealer and Clearing House the SEC asked me to whistleblow on, I have never heard the initials I.P.F. mentioned once.

I took a few minutes to look up I.P.F. I had not understood, until I began to read Google search hits, what SEC attorney Michael Rinaldi meant back when Rinaldi hissed at me I would get nothing for my being a whistleblower, that I would never see a dime on the matters the SEC pursued me to be their Investment Client whistleblower on.

I.P.F. began in 2010, pursuant to Section 922 of the Dodd-Frank Act.

Page 5 states "...the Fund will be used to finance the operations of the SEC office of the Inspector General's suggestion program..."²⁰ available to "...funding the activities of the Inspector General of the Inspector General of the Commission..."

I was shocked to read the SEC puts money stolen from Investment Client victims in to a Treasury fund that more correctly is Treasury securities the Treasury can use for other purposes. What part of "stolen" do the Securities Broker-Dealers forming the I.P.F. Advisory 'managing' monies the SEC put in to the Custodial Fund, not get, or do they which understanding as I do the moves of the SEC and FINRA/NASD scams on Investment Clients- moving money just not back to victims which is what would have happened had the SEC, a regulator with no enforcement ability, should have done as Congress wrote the SEC had to do.

September 30, 2010 the Fund was fully funded.

²⁰Exchange Act 21F(g)(2)(B)

October 2010 the SEC published its *“Annual Report On Whistleblower Program.”*

The Investor Protection Fund ending balance was \$451,909, 854.07 did not go to make Investment Client victims whole. The SEC found yet another way to cycle cash back in to the League of Wall Street business.

The SEC the Investor Protection Fund (IPF) amendments to ensure Congress' established a way to exploit, effectively and appropriately, meritorious whistleblowers limiting pay to meritorious whistleblowers in a manner intended to leverage the IPF to further the SEC's objectives which does not include turning over criminals to cops.

The Investor Protection Fund (IPF) is a simpler Main Street terms is a slush fund without serious intent to collect funds for payout rather intending the funds being kept *“in”* in the Industry. The SEC's goal is not to collect funds rather, circulate the cash, funnel the cash back to the SEC collaborators. The *‘fines’* are curated, so to speak.

In the matter of Bennett Group, one victim, alone, Philips Peter lost \$17.6 million. The SEC ALJ Court Judge Alan Grimes fined Bennett \$4 million. The SEC former lead attorney Michael Rinaldi did not file the SEC ALJ Opinion in the Court, to collect the award. The IPF is the reason why. Filing an *“Opinion”* in the Court would return monies to victims.

It is important to make note, the *“Award”*, the *“Fine”* is not filed against the Securities Broker-Dealer.

California's Whistleblower law says it best *“...If funds are recovered by the California Attorney General or political subdivision as a result of the whistleblower's qui tam case, whistleblower rewards equal 15 percent to 33 percent of the recovery obtained....”*

Other example cash circulation similar to SEC IPFs money movement are;

- (i) FINRA/NASD trained arbitrators formula for 1/10th back on a claimed loss by an Investment Client and/or Investment Advisor taken away from Courts, JAMS, AAA in to FINRA DRS
- (ii) NASD using FIRST COMMAND FINANCIAL arbitrators fine/award to begin the NASD Education Fund currently called the FINRA Education Fund.

Page 5 of the SEC *“Investor Protection Fund Report to Congress: Financials”* states *“...the Investor Protection fund was established in July 2010 and funded by transfers from SEC's Disgorgement and Penalty Amounts Held For Investors”* in Treasury Account Fund System 50X6563 deposit account.

The *“Financials”* report states clearly *“...These transfers do not meet the criteria of reportable revenue on the Income Statement as defined in the Statement of Financial Accounting Concepts Number 5 “Recognition and Measurement in Financial Statements of Business Enterprises” or Statement of Federal Financial Accounting Standards Number 7 “Accounting for Revenue and*

Other Financing Sources and Concepts for Reconciling Budgetary and Financial Accounting...” further stating “*Income Statement was not prepared...*”

The Fund Report To Congress further said “...*The SEC is comprised of a single federal bureau*” continuing “...*the Investor Protection Fund is a fund within the SEC...*”

The Fund Report says “...*the SEC remains liable for paying the whistleblower...*” further stating “...*whistleblower payments may be made from the Investor Protection Fund as a result of monetary sanctions paid to other agencies in related actions...*” continuing “...*all funds maintained by the Investor Protection Fund are considered earmarked funds...*”, “...*entity assets...*” with “...*all of its banking activity in accordance with directives issue by the United States Department of Treasury Financial Management Service...*” with the SEC intent to “...*invest the Investor Protection Funds in short term Treasury securities...whenever practicable...*” as practicable “...*in a special receipt fund account...*” the SEC “...*may invest them in overnight and short-term market-based Treasury bills through a facility provided by the Bureau of Public Debt...pending their distribution...*” with no definition of “*whenever practicable.*”

Page 6 of the report states “...*the SEC is working with the BPD in establishing an account and process to invest these funds in FY 2011...*” while the SEC would record the amounts paid to whistleblowers and reimburse “...*expenses the Inspector General incurs to operate the suggestion program...*” continuing “...*J. Revenue and Other Financing Sources... The Investor Protection Fund will be financed by receiving a portion of monetary sanction collected by the SEC in judicial or administrative actions brought by the SEC under the securities laws that are not added to the disgorgement fund or other fund other section 308 of the Sarbanes-Oxley Act of 2002²¹...*” continuing “...*or otherwise distributed to victims of a violation of the Securities laws...*” continuing “...*considered financing sources...*” continuing “...*the SEC may request the Secretary of the Treasury to invest Investor Protection Fund amounts in Treasury Obligations...*”

The Whistleblower proposal states, page 13,

“...*whenever the reserve in the IPF falls below \$300 million, Section 21F(g)(3) requires the Commission to replenish the IPF.118 These funds otherwise would be directed to the Treasury, where they could be made available for use in funding other valuable public programs...*”

What could the SEC be more concerned about, for this Investor Protection Fund money stolen from victims that the Treasury could use for special undefined projects?

The SEC had plans,²² “...*The SEC plans to invest the Investor Protection Funds in short-term Treasury securities, whenever practicable. ... The interest earned on the investments is a*

²¹ 15 U.S.C. 7246

²² https://www.sec.gov/files/whistleblower_report_to_congress.pdf

component of the SEC fund balance and available to be used for expenses of the Investor Protection Fund. Oct 26, 2010...”

I remembered the recent article I researched and wrote²³ on FINRA/NASD adjudicating a \$12.5 million fine in the matter of FIRST COMMAND Advisory²⁴, serving military and veterans. ¾ of the \$12.5 million NASD/FINRA fine went to funding SEC research on Investors, ¼ of that \$12.5 million went to creating a FINRA Fellowship that never worked right for military spouses moving zipcode to zipcode. Some money, from a curated period the SEC and FINRA/NASD determined would be the time period to sue in and for, went to the harmed heroes, pennies on the “*other valuable public programs*” the SEC “*made available*” from fines.

Neither the SEC nor FINRA/NASD took the First Command matter to cops. Keeping crimes from cops in our ‘see something, say something’ culture is a crime. The SEC and FINRA/NASD took the Investment Advisory complaints in to the Securities Broker-Dealer forum, a crime in itself, a silencing of victims.... trusting lawyers curating ‘*protection*’ from cops.

FINRA/NASD is a securities Broker-Dealer only forum.²⁵

“...lawyers who represent investors and those who represent investment advisers (IAs) which are not FINRA members about the availability of FINRA’s arbitration and mediation forum to resolve their disputes. Currently, such disputes are resolved in court or in non-FINRA dispute resolution forums...”

The SEC, a securities Broker-Dealer only regulator, approving a FINRA/NASD funding “*...valuable public program...*” that strategizes ways to get Investment Clients to invest is suspect, running victims cash to make the Treasury “*other valuable public programs*” run.

FINRA/NASD, is an IRS approved 501(c)(6) dues collecting business league for Securities Broker-Dealers only. FINRA/NASD is not a business league for Investment Advisors or Investment Clients. The SEC directing funds away from harmed Investment Client victims to send funds to the Treasury then use those same funds to help securities Broker-Dealers is a scam, Wall Street, the SEC, FINRA/NASD actively kept cops away from moreso via IPF, Investor Protection Fund, looks like money movement, some might call laundering.

Details of the IPF Advisory Board took a while to find. Members of the 2012 IPF Advisory Board are not Investment Clients, Whistleblowers and/or Investment Advisors:

Darcy Bradbury, Managing Director and Director of External Affairs, D.E. Shaw & Co., L.P.

- J. Robert Brown, Jr., Law Professor, University of Denver
- Joseph Dear, Chief Investment Officer, California Public Employees’ Retirement System
- Eugene Duffy, Partner and Principal, Paradigm Asset Management Co. LLC

²³ www.centerforcopyrightintegrity.com

²⁴ www.centerforcopyrightintegrity.com

²⁵ https://www.finra.org/arbitration-and-mediation/investment_advisers

- Roger Ganser, Chairman of the Board of Directors of Better Investing
- James Glassman, Executive Director, George W. Bush Institute
- Craig Goettsch, Director of Investor Education and Consumer Outreach, Iowa Insurance Division

Joseph Grundfest, William A. Franke Professor of Law and Business, Stanford Law School

Melody Hobson, President and Director of Ariel Investments, LLC

Stephen Holmes, General Partner and Chief Operating Officer, InterWest Partners

Adam Kanzer, Managing Director and General Counsel of Domini Social Investments and Chief Legal Officer of the Domini Funds

Roy Katzovicz, Partner, Investment Team Member and Chief Legal Officer, Pershing Square Capital Management, L.P.

Barbara Roper, Director of Investor Protection, Consumer Federation of America

Kurt Schacht, Managing Director, CFA Institute

Alan Schnitzer, Vice Chairman and Chief Legal Officer, The Travelers Companies, Inc.

Jean Setzfand, Director of Financial Security for the AARP

Anne Sheehan, Director of Corporate Governance, California State Teachers' Retirement System

Damon Silvers, Associate General Counsel for the AFL-CIO

Mark Tresnowski, Managing Director and General Counsel, Madison Dearborn Partners, LLC

Steven Wallman, Founder and Chief Executive Officer, Foliofn, Inc.

Ann Yerger, Executive Director, Council of Institutional Investors..."

2017 IPF Advisory Committee:

Matthew Furman, General Counsel, Willis Towers Watson plc

Stephen Holmes, General Partner Emeritus, InterWest Partners

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William Lee, Senior Vice-President and Chief Investment Officer, New York-
Presbyterian Hospitals

Paul Mahoney, David and Mary Harrison Distinguished Professor of Law, University of
Virginia School of Law

Jennifer Marietta-Westberg, Senior Economist, Cornerstone Research

Lydia Mashburn, Managing Director, Center for Monetary and Financial Alternatives,
Cato Institute

Mina Nguyen, Jane Street Capital

Barbara Roper, Director of Investor Protection, Consumer Federation of America

Damon Silvers, Director of Policy and Special Counsel, AFL-CIO

Anne Simpson, Investment Director, Sustainability, California Public Employees'
Retirement System

Jerome Solomon, Fixed-income Portfolio Manager, Capital Group

Heidi Stam, Former Managing Director and General Counsel (Retired), Vanguard

J.W. Verret, Associate Professor of Law (with tenure), Antonin Scalia Law School,
George Mason University and Senior Scholar, Mercatus Center

Susan Ferris Wyderko, President and CEO, Mutual Fund Directors Forum

Anne Sheehan, Chairman, Former Director of Corporate Governance, California State
Teachers' Retirement System (Retired)

Elisse Walter, Vice Chairman, Former Chairman U.S. Securities and Exchange
Commission

Craig Goettsch, Secretary, Director of Investor Education and Consumer Outreach Iowa
Insurance Division

Nancy LeaMond, Assistant Secretary, Executive Vice President Chief Advocacy and
Engagement Officer Community, State and National Affairs, AARP

Allison A. Bennington, Partner and General Counsel, Value Act Capital

John Coates, John F. Cogan Jr. Professor of Law and Economics at Harvard Law School
and Research Director of the Center on the Legal Profession

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Lisa Fairfax, Leroy Sorenson Merrifield Research Professor of Law and Director of
Conference Programs, C-LEAF, The George Washington University Law School

Rick Fleming, Investor Advocate, U.S. Securities and Exchange Commission

H. David Kotz, Inspector General of the SEC, 2010, wrote to then SEC Commissioner Mary
Schapiro the SEC OIG relied on

*"...the GAOs work on the Commission's internal control over financial reporting as the
Investor Protection Fund's financial reporting is part of the Commission's overall
financial reporting and the Investor Protection Funds financial reporting is part of the
Commission's consolidated financial statements..."*

The 2010 *"Report to Congress: Financials"* does not state, anywhere in it, the Treasury can
spend the monies on Treasury special projects. The Advisory Board are accountable as
accessories.

The SEC is recycling compromised funds. These funds are taken from victims. On Main Street, these
funds are called 'stolen.' Not on Wall Street.

The idea that stolen monies are passed forward to the IPF instead of back to victims is mindboggling,
unconscionable but when this SEC system was curated to circumvent cops that, in my mind makes the
SEC employees complicit, in cop talk... accessories. The FINRA/NASD structure of AWC Acceptance
Waiver Consent is a con. Crimes go to cops. Stolen funds are restored to victims.

The 2010 *"Report to Congress: Financials"* does not state, anywhere in it, the SEC can recycle
stolen funds.

I learned;

(i) the SEC asks the whistleblowers for all the information the whistleblower can give the SEC (refer to
letter 12-2-2010)

(ii) the whistleblower might turn in information on more than one entity and/or individuals. The SEC
response letter limits who the SEC lists may be credited to the whistleblower

(iii) the SEC may be told about a crime that goes on for years. The SEC arguing lawyers select the
window of time the SEC lawyers form their argument(s) around ie. in my situation as an SEC requested
Investment Client whistleblower, my personal involvement began 2009. Documents I added went back
2005 and earlier all the way up to present date. The SEC lawyers selected an 18 month period within
which to curate the SEC case

(iv) The SEC attorneys curate the SEC case to fit areas of SEC 'oversite', that is, understanding the SEC
has no oversight of Investment Advisors, Investment Clients and Ponzi schemes. It is in the interest of the
SEC to keep crimes by Investment Advisors, Investment Clients and Ponzi schemers away from cops
who would expose the true numbers of financial crimes and the real numbers of FINCEN stats otherwise

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covered up when the FINRA/NASD take crimes away from cops in to the Securities Broker-Dealer only dispute resolution forum.²⁶

SEC motivation is money. Investment Advisor fines and penalties contribute as a source of revenue to the "I.P.F." fund explaining why SEC ALJ Judge fines are out of whack with reality of the crime numbers ie. 3-16801, the "Hoodoo Investment Advisor" one victim alone Philips Peter lost \$17.6 million. The SEC ALJ Judge only fined the "Hoodoo Investment Advisor"²⁷ \$4 million. SEC Commissioners Michael Piwowar and Kara Stein relied on SEC & Freytag. SCOTUS, Supreme Court of the United States revisited Freytag as SEC precedence with the SEC adjudication of SEC v Lucia and Epic Systems v Lewis.

The SEC went on to file a 2nd case.²⁸ The "Hoodoo Investment Advisor" crimes were known to the SEC back in the 1990s. SEC knew about Madoff's crimes back in 1963, fifty years before Madoff turned himself in. 1 month after the FINRA/NASD fined Madoff, again, for "No Product."

My reading about I.P.F. Investor Protection Fund was pattern, what the SEC does, has done over the years, accepted as pattern and practice.

What remains are the facts, \$175 million front load for the time period the NASD/SEC carved out to 'investigate' military complaints within.

\$4.4 million 'went' to the FINRA Foundation Military Spouse Fellowship program.

\$12.5 million 'went' to creating the NASD Education Foundation.

First Command has been around since the 1950's.

The SEC 'curated' investigation period was limited to a few years, carving 'covered action' to benefit the story the SEC needs to present publicly to be compliant with laws Congress wrote the SEC is the regulator to see are followed except like Cinderella's mean sisters trying to shove their feet in to the glass slipper, just because the foot can be wedged in does not mean the shoe fits, just 'shoved' in to look like it does.

The \$12.5 million did not go back to the harmed military.

The \$175 million front load and the \$12.5 million 'fit' the SEC/FINRA-NASD formula of restoring 1/10th of funds to victims. Military heroes deserve better. Investment Client victims deserve better too.

The curious timing of the SEC 'whistleblower proposal' is understood if the SCOTUS Supreme Court decisions on Epic Systems v Lewis, SEC v Lucia and SCOTUS denial to hear Bandimere a repeat of SEC v Lucia, are looked at.

SCOTUS confirmed the SEC has no right to take Investment Advisor cases away from JAMS or AAA. The SEC had no right to engage Investment Clients nor did FINRA/NASD, a source of funds for the I.P.F., Investor Protection Fund will be lost.

²⁶ https://www.finra.org/arbitration-and-mediation/investment_advisers

²⁷ <http://www.whitesecuritieslaw.com/2017/04/04/dawn-bennett-ordered-pay-4-million-sec/>

²⁸ <http://www.dailymail.co.uk/news/article-4840938/Radio-host-ran-Ponzi-scheme-tried-cast-spell-SEC.html>

The SEC is funding the I.P.F. with stolen client funds along with fines against Investment Advisors the SEC and FINRA/NASD have no oversight of, is a sad bottom line knowing had these crimes gone to copys, victims would have their assets restored to them while the SEC plays industry robbing hood, robbing from the poor to give to the rich.

The Whistleblower proposal states “...*In advancing proposed paragraph (d), we are mindful of our own responsibility to investors and the general public to ensure that the Investor Protection Fund (IPF) that Congress established to fund awards is used efficiently and effectively to achieve the program’s objectives...*” Congress established an Investor Protection Fund in the 1970s.²⁹

The Whistleblower proposal states “...*Multiple such awards would, in turn, cause the funds in the IPF to be diminished...*” The SEC cannot pull cash from Investment Advisors brought in to SEC ALJ Courts anymore. SCOTUS decisions of Epic v Lewis, SEC v Lucia and denial to hear #metoo SEC v Bandimere makes diminishment of IPF funds a reality.

That same Act states “...*(Sec. 419) Directs the SEC to adopt a rule that prohibits registered investment advisers from maintaining custody of client assets in excess of \$10 million, unless the assets are kept by a qualified custodian, maintained in separate accounts under the client’s names, or retained in an account of which the investment adviser is the trustee. Prohibits the qualified custodian from directly or indirectly providing investment advice to the funds it holds in custody...*”³⁰ also stating “...*(Sec. 506) Increases from \$250,000 to \$850,000 the total amount of claims of all customers of a small firm whose failure the SIPC may resolve using the direct payment procedure (instead of using a judicial liquidation proceeding...*”³¹ continuing “...*(Sec. 302) Amends the Investment Company Act of 1940 to direct the SEC to issue rules for imposing fees on registered investment advisers to recover its cost of inspecting and examining them....*”³² continuing “...*(Sec. 306) Directs the SEC to report on the implementation of reforms which it outlined in the wake of the discovery of fraud by Bernie Madoff....*”³³

The Act requires the SEC to complete enforcement action within 180 days, “...*(Sec. 209) Requires the SEC to complete enforcement investigations and determine whether or not to file an action within 180 days after its staff provides a written Wells notice to any person. Allows an exception to this deadline for complex actions to permit additional 180-day extensions in certain circumstances....*”³⁴ The SEC took action in 2017.

The same Act also states “...*Title II: Enforcement and Remedies - (Sec. 201) Amends the Securities Exchange Act of 1934 and the Investment Advisers Act of 1940 to authorize the SEC to restrict mandatory pre-dispute arbitration affecting customers or clients of an investment*

²⁹ <https://www.sipc.org/about-sipc/history>

³⁰ <https://www.congress.gov/bill/111th-congress/house-bill/3817>

³¹ <https://www.congress.gov/bill/111th-congress/house-bill/3817>

³² <https://www.congress.gov/bill/111th-congress/house-bill/3817>

³³ <https://www.congress.gov/bill/111th-congress/house-bill/3817>

³⁴ <https://www.congress.gov/bill/111th-congress/house-bill/3817>

adviser... ”³⁵ continuing “... (Sec. 202) Directs the Comptroller General to study the costs to parties of an arbitration proceeding using the arbitration system operated by the Financial Industry Regulatory Authority (FINRA) and overseen by the SEC as compared to litigation... ”³⁶

The SEC want people to believe the “proposed rule will result in more awards being paid from the IPF because awards would be paid for non-prosecution and deferred prosecution agreements entered into by the U.S. Department of Justice...” alleging “... Proposed Rule 21F-3(b)(4) and proposed Rule 21F-6(d) could foster a more efficient use of the IPF by avoiding awards that are not reasonably necessary in light of the whistleblower program’s goals and the interests of investors and the broad public interest...”

WALL STREET v MAIN STREET 2 DIFFERENT SETS OF LAWS IS NOT THE WAY THE LAW WORKS except on Wall Street:

The rumoring as to why Wall Street CEOs do not go to jail while Main Street does stopped being a rumor when I wrote my article “Congress Created Madoff.” And then was the NASAA Spring conference I attended, gobsmacked, sitting in the audience of a panel talking on DPAs, deals that are cut keeping the big guys out of jail, voting, while the little fish are trotted off in to jail for a decade or so. Watching the DOJ panelists jawing it with other ‘experts’ at the front of the room on the mini stage was mindblowing at what the panelists were so eager to fill resumes with as ‘panelist at NASAA spring conference’ when the law is clear. Or what was made too clear was how cozy the DOJ is with the SEC that lawyers are willing to lose legal licenses. Watch this long enough you realize the DOJ takes the case the SEC wants pled, accepts ‘facts’ the SEC feeds without doing diligence of vetting facts or, at times, trusting that Investment Client victims information can be credible. Or when the Agent does trust the credible victim, will that Agent risk standing up to the people he answers to.

That answer is more often a ‘no.’

Around this time I was making public why the Eric Garners and Freddie Grays are found by cops for each and every arrest and why the big whales law enforcement really want to go after are not caught, let alone known of.

It was Madoff’s saying “they knew” that kept driving me until I could find and document the answer, to clear my name, to stop these crimes against Investment Client victims from going on just like I told Eleanor Holmes Norton I will do, ‘shut FINRA down’.

³⁵ <https://www.congress.gov/bills/111/congress/house-bill/3817>

³⁶ <https://www.congress.gov/bills/111/congress/house-bill/3817>

The industry sets out lawyers in advance to curate results and way forwards the Industry, Wall Street wants.

DPAs and NPAs are part of that formula Wall Street curated. DPAs are Deferred Prosecutions. NPAs are Non-Prosecution Agreements.

1960, Bernard Madoffs' parents were told by the SEC 'not to do it again.' I found the article. I made it public. In todays terms, Bernie's mom and dad had a DPA and/or NPA and, very possibly, traded information to protect... maybe Bernie. It was only 3 years later that Bernie had Bernie's first 'AWC' acceptance waiver consent, sanctioned \$500 by the NASD, the forerunner of FINRA. Ruth was Bernie's bookkeeper then and after.

To understand the difference between a DPA and NPA, I invite you to sit 9/13, or 10/4/- 11/4 in the Greenbelt MD courtroom of presiding Judge Paula Xinis. More important I ask you to arrive at Judge Xinis' courtroom to sit and watch '*white privilege*' even when the Judge busts through lawyers cons that leave the Respondent in the hands of the Public Defender. You are watching '*white privilege*.' Sit. Watch the other cases before this truly incredible maturing Judge. Young African American men don't get the DP or NPA agreements white collar criminals have escaped jail with for decades or that Bennett's sole charged co-conspirator pled to- 2 counts down from 17. In the eyes of Judge Xinis, these young men I saw, got a dose of empathy for effort made, after all these young men's history are their criminal record while the "*Hoodoo Investment Advisors*"³⁷ record of AWC, acceptance waiver consent, possible financial crimes not taken to cops for evaluating as crimes are covered up.

Answering the age old question, why don't the CEOs go to jail, the DPA and NPA are the answers why the CEOs do not go to jail.

No, there should be absolutely no Deferred Prosecutions or non-prosecution agreements as proposed unless the law applied to Main Street is replaced with AWC, acceptance waiver consent, too. That will never happen.

Proposed Rule 21F-4(d)(3) must never happen unless all SEC employees and complicit parties including but not limited to legislators, regulators, lawyers, FINRA/NASD, PIABA and others are held accountable as Accessories- before, during and after; withholding evidence, witness tampering, evidence tampering. There is one law. The SCOTUS got '*it*', '*one law*' with their rulings in SEC v LUCIA, Bandimere and Epic v Lewis that exposed how Wall Street has been violating signed Investment Advisory Employment Agreements by pulling Investment Advisors and Investment Clients in to FINRA/NASD's Securities Broker-Dealer only DRS.³⁸

The SEC has no investigative or prosecutorial or law enforcement power. The SEC is a regulator doing what Congress tells the SEC to do, only. The SEC has no authority to write policy. The SEC has no authority for the ALJ Courts that are "*Court*" in name only, not operating by the

³⁷ <http://www.dailymail.co.uk/news/article-4840938/Radio-host-ran-Ponzi-scheme-tried-cast-spell-SEC.html>

³⁸ https://www.finra.org/arbitration-and-mediation/investment_advisers

same rules real courts operate under- with subpoena power, with the ability for the Judge to scream “off with their heads” and have that happen. Judgements, “*monetary sanctions*” the SEC ALJ Court issues are more like ‘*suggestions*’ in that the SEC does not register the “*Opinion*” either.

The SEC has no authority, period. The SEC staff who wrote this proposal know, writing, “...*the Commission has previously exercised its interpretive authority to pay a whistleblower award with respect to a DPA entered into by DOJ on the basis that such agreements are filed in a federal court action that charges the defendant with violations of law...*”

What the #*\$& is “*interpretive authority*” ?

Making a Deferred prosecution and a non-prosecution agreement by the DOJ or a state attorney general in a criminal case, or a settlement agreement entered into by the Commission outside of the context of a judicial or administrative proceeding deemed a “monetary sanction” is wrong. Doing that is a violation of the one law that applies to Main Street and Wall Street equally.

Proposed Rule 21F-4(d)(3) must not “...*provide that, for purposes of making a whistleblower award, a DPA or NPA entered into by DOJ or a state attorney general in a criminal case would be deemed to be an “administrative action” and any money required to be paid thereunder would be deemed a “monetary sanction...”*” The Citizen Whistleblower gets paid what they are owed for doing the job the SEC got caught keeping covered up. These crimes are known, the higher up the SEC and FINRA/NASD ‘*food chain*’ one goes.

The SEC staff have to ‘*get it*’ what the SEC staff believes on “*the statutory term “administrative action” is sufficiently ambiguous and broad enough to permit us to interpret the term to include DPAs and NPAs when these instruments are employed by DOJ or a state attorney general, or settlement agreements entered into by the Commission outside of the context of judicial or administrative proceeding...*” means nothing. The SEC staff are accountable to the law. The SEC staff trying to carve themselves out a pass on the law is deemable as a conspiracy to circumvent the law, the SEC staff have already been circumventing for decades.

SEC FOIA CONFIRMS SEC INVESTIGATORS ARE NOT TRAINED INVESTIGATORS, just lawyers:

The “*HOODOO Investment Advisor*”³⁹ is proof positive SEC investigators are not of such quality to cause SEC staff to open securities fraud investigations, or otherwise contribute to a successful enforcement action, as set forth in Rule 21F-4(c). The SEC ‘*investigators*’ are lawyers not investigators. The SEC ‘*investigative staff*’ ‘*investigate*’ securities fraud, violations of Federal law. ‘*Financial fraud*’ is investigated by law enforcement, that is ‘*if*’ not when law enforcement learns of financial fraud. The SEC covers financial fraud up from cops.

³⁹ SEC 3-16801

ie Darren Goins. Goins penned the infamous *'I see no fraud'* email sent on behalf of the SEC *'investigators'* based in Philly. That was 7+ years of more victims ago. 7+ years of more victims later it is confirmed by FOIA, none of the SEC *'investigative team'* are trained investigators, just lawyers.

The SEC staff writing this Whistleblower Act update proposal complain about delays in crime solving. 8+ years of delay by the SEC is something to complain about, I agree. I believe greater efficiency in detecting SEC employee violations would speed up the public disclosure of such violations by SEC employees on the securities markets and on Investment Clients.

SEC staff is clueless deciphering what is meritorious complaint. The SEC staff is clueless to deciphering what is a potentially meritorious award applications, what is a credible whistleblower.

FINRA & SEC ENFORCEMENT THE SAME AS LAW ENFORCEMENT... NOPE, IT'S A CON ON COPS:

Criminal accountability is lacking. The erroneous belief is the SEC cannot be sued. Sorta. The SEC agency cannot be sued. SEC employees can and should be. A federal job is not a gateway out of accountability for failure to act on a federal or other crime. SEC employees that knowingly, with intent, deceive Magistrates and Presiding Judges by withholding key facts the Judges are not told is criminal as is SEC employees curating a case to *'fit'* SEC laws regulating SEC oversight of Securities Broker-Dealers. It is withholding evidence, tampering, false writing, intent to mislead or hinder.

If you or I did what the SEC staff are doing we would go to jail. Via FOIA I confirmed few SEC staff complaints, violations of laws, federal and criminal, are referred out to cops. It is the role of cops to be cops, not the SEC.

The SEC staff wrote the SEC receives on average approximately 700 Forms TCR and 110 Forms WB-APP annually. Do the math.

There are 590 Citizen Whistleblowers who did not know when to submit their WB-APP form to the SEC, required to *'be considered'* or *'entertained'* by the SEC to receive their Whistleblower Award. This is 700 potential credible financial crimes not reported to Cops.

No number is given how many of the 700 Citizen Whistleblower tips are submitted by lawyers representing clients.

No number is given how many of those 110 WB-APP submitters are Citizen Whistleblowers or represented by Counsel.

The SEC staff mislead on the value of Tips for law enforcement crime statistics, co-morbidities and for FINCEN stats. A database must be created with the guidance of law enforcement, not picked by the SEC staff.

The SEC staff details on whistleblower tips does not reflect true crime value. The SEC staff knew about the Bennett crimes in 2009. The SEC staff narrowed the tip down to a window of 14 months, narrowing the severity of the financial fallout, minimizing the amount of the award the SEC would slap on the wrist of the “employee” Investment Advisor, not on the responsible firm behind their salesperson, covering up criminal charges from happening and from being presented as such in the Investment Advisor’s history.... One doesn’t do the time, if there is no crime....

Lack of law enforcement involvement is sorta not law enforcements fault. If I could figure this out, they could to. It seems FINRA/NASD fan out education taught to cops that I call the “koolaid” teaching cops that FINRA is the first step of enforcement for financial crimes.

FINRA is not.

Enforcement is not law. Enforcement is like me telling you walk to my right but when you walk to my left I enforce that with writing you with a chore like 10 squats, while if you walked to my right in the middle of traffic, then law enforcement will write you up for breaking a law.

Explaining ‘enforcement’ v ‘law enforcement’ this way, cops get it.

The SEC staff further mislead writing “...we are also aware that DOJ might pursue law-enforcement actions that potentially implicate both the Commission’s whistleblower program and the whistleblower award program that the IRS...”

The SEC did not call cops on the “HOODOO Investment Advisor.” A clerk in a Waldorf Bank called the cops, bringing the FBI in on crimes that went on as far back as 2009 and maybe earlier. Keeping crimes away from cops is Accessory To A Crime, Before, During or After; Witness Tampering; Evidence Tampering, and so on.

Section 21F(a)(6) of the Exchange Act requiring an individual report a possible securities law violation to the Commission in order to qualify for employment at the SEC, the reader presume. People on Wall Street don’t often comply with rules or do what they are told. Case in point, lawyers lead Investment Clients and Investment Advisors away from courts where they belong in the courts instead taking them in to the FINRA/NASD securities only dispute resolution forum for their dues paying members, the securities Broker-Dealers the Investment Client victims are suing, where the Investment Advisor does not belong.

And if one takes time to do a deep dive in documents in to a “broker” listed in finrabrokercheck, one of the first things that wont be found is that there is no such thing as a broker in the securities world, and, (ii) take time to research the Investment Advisor in other courts, jurisdictions, etc. Amazing what shows up more often than not- all that stuff that should have been in the finrabrokercheck and is not, too late for the Investment Client victims.

Carrie Devorah
PUBLIC INVESTOR 12-03894
TELLING INVESTMENT CLIENTS & INVESTMENT ADVISORS THINGS WARREN BUFFETT DOES NOT KNOW TO TELL THEM
THAT WALL STREET DOES NOT WANT EXPOSED

The SCOTUS decisions on EPIC v Lewis, SEC v Lucia, the Supreme Court Of The United States denying Bandimere has upended SEC business as usual, covering up crimes to protect the Securities Broker-Dealers the SEC has oversight of only.

The SEC staff is not reporting how many of the Whistleblower tips that lead to monetary awards are turned over to law enforcement. I asked that question.

None. Data on whistleblower tips leading to successful enforcement actions prior to the establishment of the Commission's whistleblower program is distorted intentionally by the SEC regulatory agency failing for decades, with intent. The SEC staff are not competent to decipher who is frivolous or fraudulent. The SEC staff behavior is fraudulent through this lens.

The Commission fakes the date windows and parties against whom crime are done controlling data release on whistleblower program monetary awards, faking data, controlling data that is released., as it stands now.

Silencing good hearted people intent to right a wrong. Honesty should not be collateral.

SEC employee failure to tell cops about a crime is a crime.

Allowing criminals to be recividous remaining uncaught under AWC, Acceptance Waiver Consent is criminal. SEC FOIA response confirms there is no written confirmation from Congress on AWC in securities Broker-Dealer, allowing SEC handled criminal matters to avoid pleading "guilty or not guilty."

Denying victims Due Process is criminal. Interesting how the words "Due Process", "Victims" and "Criminal" appear nowhere in the SEC staff 185 page proposal.

Denying victims DOJ support system is criminal.

Allowing men and women to remain uncaught- Madoff, Murphy, Bennett- while other are incarcerated for life for crimes they did not do- Matthew Otis Charles, Lamar Johnson, Mary Johnson- is unconscionable yet SEC staff appear to not be bothered.

The SEC is not law enforcement, not cops. The SEC should have no sole discretion, to decide if a Citizen Whistleblower "failed to comply with the procedural requirement." The SEC has already shown what the SEC is- the problem.

What Cops see is the SEC curated contrived "success" of 'enforcement.'
The SEC staff is not independent analysis ie Bennett 1 victim alone \$17.6 mil and ALJ Judge decision was \$4.4 mil

The notion "Independent Analysis" will free up SEC staff resources to concentrate on "meritorious claims or the more difficult determinations" is colored by , what is real, the SEC

staff is not educated to what is meritorious claim and that meritorious claims is denied under the SEC staff "...summary disposition process while other claims may remain pending under the Rule 21F-10 or Rule 21F-11 process..."

SEC staff 'do' what person before them told them to do. Sad. So many lives are destroyed.

SEC QUESTIONS HOW MUCH CITIZEN WHISTLEBLOWERS SHOULD BE PAID . HOW MUCH MONEY THE SEC IS INTENTIONALLY NOT PAYING CITIZEN WHISTLEBLOWERS THE SEC WANTS TO GIVE TO THE SEC SLUSH FUND IS THE QUESTION:

My experience as a whistleblower, from 'tip' submission through to filing the WB-APP, whistleblower application provides insight. The SEC is complaining about having to do work responding to "a small number of claimants have imposed an undue burden on the award determination process by submitting dozens and in some cases over a hundred award applications that lack any colorable connection between the tip that they provided and the Commission enforcement actions for which they are seeking awards..."

My submission documents connected the 'Investment Advisor', the 'Broker-Dealer', the Clearing House and respective employees.

What the SEC and these agencies lack is a tipsheet, a handbook, a simplified plainly written in English not lawyer. This failure to comply with the Plain Writing Act⁴⁰ is a failure of the SEC not an opportunity to "utilizing the procedural opportunities to object to an award..."

Would mitigate having to write "You should carefully review those rules before you submit any information that you may later wish to rely upon to claim an award." SEC complying with Plain Writing Act would simplify whistleblowers complying with the cross-referenced rules, especially proposed Rule 21F-9(a) and (b), which require the submission of information to the Commission either on Form TCR or through www.sec.gov.

The SEC posts online it adopted the Plain Writing Act of 2010. You would not know it if you read correspondences the SEC sends out.⁴¹ The CFPB has a Plain Writing Act compliance report.⁴² So does the SEC.⁴³ Amazingly the SEC has a "Plain English Handbook."⁴⁴

⁴⁰ <https://www.govtrack.us/congress/bills/111/hr946>

⁴¹ <https://www.sec.gov/plainwriting.shtml>

⁴² <https://www.consumerfinance.gov/data-research/research-reports/plain-writing-act-compliance-report-2015/>

⁴³ <https://www.sec.gov/files/PWAComplianceReport2018.pdf>

⁴⁴ <https://www.sec.gov/pdf/handbook.pdf>

The SEC returned '*confirmation letter*' from SEC Investigator Cindy Hoekstra listed only BGFS, Bennett Group Financial Services. Bennett Group Financial Services is/was an SEC approved Financial Advisory Firm. Qualifying firms must meet SEC requirements. If a firm matches the SEC requirements is only confirmable via FOIA, that is if the SEC cooperates. Multiple '*there are no documents*' FOIA responses later, a copy of the '*filed*' '*acceptable*' SEC application was provided, containing digital footprints of red lined numbers and strike outs, raising question as to the firm's SEC qualification. 8+ years of more victims later post the SEC requesting I be their Investment Client whistleblower, the matter is in the Maryland District Court only. Securities Broker-Dealers and Investment Advisors are licensed state to state. Other state(s) were told to stand down.

The SEC 12-2-2010 TIP/document confirmation letter only indicates in the subject line "*Bennett Group Financial Services.*"

The SEC does not list in the subject line the also reported Western International Securities, JP Morgan that Cleared for Western International Securities in the Western International Securities/Bennett '*relationship*' nor the named employees that were reported to the SEC Philly based Investigator team of Hoekstra, Goins, Thomas and others.

The SEC has '*massaged*' out Securities Broker-Dealer Western International Securities the SEC has oversight of.

The SEC has '*massaged*' out Securities Broker-Dealer JP Morgan the SEC has oversight of.

The SEC has '*massaged*' out the CEO of Bennett Group Financial Services. The SEC has no oversight of Investment Advisors.

The SEC has '*massaged*' out the CEOs of Western International Securities and JP Morgan that the SEC has no oversight of and the named "*employees.*" The "*employees*" of Bennett Group Financial Services are Independent Contractors of Western International Securities, all listed on the SEC IADP sight as "*Investment Advisors.*" The SEC has no oversight of Investment Advisors.

You see how the SEC '*removes*' from the Whistleblower Award potential key named parties reducing the amount of the Whistleblowers Award presuming the SEC Investigators do diligence as the time post reporting moves forward ethically. Rule of thumb, once a liar usually that is who they are, its just that you didn't catch the next lie, yet.

The SEC "*investigators*", confirmed by FOIA, are not trained Investigators. The SEC "*investigators*" are lawyers. It took me a while to understand why the SEC employs lawyers to "*investigate*" fraud and crimes. The SEC lawyers are assuring the SEC steps taken are '*compliant*' with SEC rules Congress wrote which the SEC must follow. SEC "*investigators*" are about keeping the SEC out of trouble not putting the reported crimes and criminals in to law enforcement clutches.

The SEC is presumed to be operating with the best interest of Investment Clients at heart. The SEC is operating with the best interest of the entities, the Securities Broker-Dealers, at heart, using the words "*investor protection*" as the kool aid Main Street and legislators drink, a kool aid that is force fed to law enforcement consistently being told by FINRA to '*stand down.*'

The TIP is mailed or emailed to the SEC whistleblower office.

The Tipster receives a confirming letter that contains absolutely no information connecting the Tipster to which of the Tipsters submissions, just a TCR number and a date.

The Tipster does not receive a tip sheet, a '*handbook*'/'*guidebook*' of what the next steps are. The Tipsters receives the letter like the 12-2-2010 letter I received from Cyndi Hoekstra, stating, "*Cooperation in furnishing information is very important to us in fulfilling our enforcement and regulatory responsibilities under the federal securities laws...*" continuing "*...your documents have been referred to the appropriate people within the Commission...*"

The letter does not state the documents are referred to Law Enforcement. The documents are not provided to law enforcement. The SEC does not tell cops. Telling cops would tip law enforcement to a crime. The SEC protects crimes, Ponzi schemes, independent contractors and bad Investment investors from cops.

The SEC "*investigators*" letter alleges SEC 'investigation' is confidential to "*...protect the integrity of an investigation from premature disclosure and to protect the privacy of persons with respect to whom unfounded charges may be found...*"

In fact, what the SEC is doing is tolling statutes that law enforcement is bound to, that Investment Clients are bound to. Tolling statutes runs the time within which claims can be pursued except what the SEC Investigators and prosecuting lawyers do is, on the SEC end, with no legal or Congressional permission, independently "*freeze*" the statutes as the SEC Philly based Investigator/Lawyers did in the case of the "*HOODOO Investment Advisor.*"⁴⁵

The SEC writes there are exceptions to the '*SEC rule*' stating ability to get "*disgorgement within 5 years of the date the violation occurred.*" The SEC disclaimer the "*Commission must bring any enforcement action seeking to obtain civil penalties within five years of the date the violation occurred*"⁴⁶ is obtuse.

- (i) The SEC is not the law. Crimes go to cops
- (ii) In the world of the Criminal Code, there is "*cold case files*". "*Cold Case*" do not toll. They stay open until solved.

The next way you will see how the SEC winnows down the parties the Whistleblower is entitled to compensation from Tips the Whistleblower brought in is by, what I call "*curating*" the window of time the SEC Investigator/Lawyers choose to limit the crime story to.

⁴⁵ Page 25, Initial Default decisions 3-16801

⁴⁶ 127 17 CFR 240.21F-6(b)(2)

I brought in tips detailing pre 2014, pre 2009, pre 2006 even pre 2005 even as far back as 1990's as the document trail, I assembled, was showing. The SEC investigators narrowed their 'curated' story window to about 18 months winnowing down even further compensation from Tips the Whistleblower brought in the Whistleblower is entitled to.

The next SEC step in curating the case based upon the Tips the Whistleblower brings in is to not report suspected crime to law enforcement. Investment Clients are misled in to believing the victims only outlet to report the crimes is the SEC and FINRA/NASD. This is an intentional 'curate' intended to keep crimes from cops, remembering at the same time statutes a Court holds to are being 'lost' for cops and Investment Client victims.

Enforcement is not law enforcement. Investment Client and Investment Advisor victims presume the directions they are receiving to follow are from competent professionals knowing the law. Yes. Sometimes knowing the law is to understand how to circumvent the law as the SEC lawyers do by taking in and 'prosecuting' cases in the SEC ALJ Court.

The case of the "*HOODOO Investment Advisor*" is model for what takes place in an SEC ALJ Court

- (i) defendants cannot be forced or subpoenaed to appear in the court. SEC ALJ Court is not a court. SEC ALJ Court does not operate under Court rules
- (ii) Investment Advisors cannot be forced or subpoenaed to appear in the court. The SEC has no oversight of Investment Advisors or Investment Clients. There is nothing the SEC can threaten Investment Advisors or Investment Clients who refuse to appear with for not appearing before the Judge as requested. Appearances, btw, are telephonic for a large part. Usually appearance in person are forced upon celebrities. The SEC does factor in for cases that can be high profile ie Martha Stewart
- (iii) The SEC lawyers walk the ALJ Judge through the case, telling the ALJ Judge how to proceed (court transcripts screengrabs www.centerforcopyrightintegrity.com)
- (iv) the SEC ALJ Judge listens to SEC curating lawyer 'cherry picked' witness/victims. Victim/witness Phillips Peter testified he lost no less than \$17.6 million.
- (v) The SEC ALJ Judge issued an opinion for \$4 million, only
- (vi) Awards must be collected, the SEC say. The SEC did not file the SEC ALJ Judge 'opinion' in to a Court, required for collection of the SEC ALJ Judge ordered fine.
- (vii) In the case of the "*HOODOO Investment Advisor*", presiding Judge Xinis states concern source of payments are from victims' funds. "*HOODOO Investment Advisor*" was running a Ponzi scheme predating the SEC Investigator/lawyer 'curated' period SEC lawyers restricted litigation to.⁴⁷

You can see how with the one victim the SEC did state stolen funds 'loss' of , how the whistleblowers TIP is reduced from a piece of \$17 million to a piece of \$4 million. Maybe.

Former SEC lawyer Michael Rinaldi told me I would get nothing. In fairness, with my learning the above, Rinaldi is correct. The SEC team works to cheat Whistleblowers out of their award.

⁴⁷ SEC Commissioner Michael Piwowar told me the Commissioners meet to decide what cases the Commission will take to prosecution looking for cases that bring prominence and attention to the Commission's work

The number of victims are not known to the Whistleblower. Potential amounts of victims are known to the SEC. Phillips Peter did not file a FINRA/NASD arbitration against the "HOODOO Investment Advisor", her securities Broker-Dealer and/or JPMCC the Clearing firm that had no contractual ability to clear BGFS client cash. Omega, Mount Vernon Ladies Association and Dimensions⁴⁸ did not file an action in FINRA/NASD either. None of their names are listed in the SEC CRD states securities commissioners have. The CRD names 15+ victims.

The CRD does not name denied⁴⁹ complaints, expunged complaints or victims unable to get lawyer representation because lawyers did not feel the amount lost, regardless of the amount being life savings, is not adequate for the lawyer to make money from. Lawyers are more often about the money rather than the law. Lawyers do have expenses to cover, just a fact of life, victims lose because of.

Claims are also "*expunged*" from the CRD without going through the '*required*' expungement process.

In all of this time, there is no communication from the SEC post the TIP being submitted.

There is no notice from the SEC where the TIP is in the SEC investigating track.

There is no communication from the SEC if the SEC is taking the Whistleblower's submissions and updates, and if that information is being used by the SEC to launch investigation in to the other named parties.

The Whistleblower does receive confirmation emails from the SEC advising the submission is received, and the submission date that update is being connected to ie 8/13/2013.

The SEC does not advise the Whistleblower if the SEC is using the Whistleblower's information to begin investigating the other named firms and parties.

There is no notification if the WB-APP period of 90 days begins to toll. The WB-APP 90 day period is the time in which the Whistleblower must submit their claim to the award to the SEC.

You now have a vignette in to how the SEC curates Whistleblower tips to cheat whistleblowers out of earned awards.

⁴⁸ SEC 3-16801, Initial Default Decision

⁴⁹ FINRAbrokercheck, Senator Ed Markey's '*baby*', lists victims claims as being denied when victims claims are negotiated. Senator Markey would not provide comment, though asked repeatedly. A conflict of interest for Markey and Warren is that FINRA banks in the Senators' state of Massachusetts.

THE SEC WHISTLEBLOWER ACT PROPOSED UPDATE INCREASES HARMS FOR INVESTORS & THE PUBLIC FROM THE SEC:

The SEC pulling crimes away from cops is gone on for decades. SEC misconduct concerns have been ongoing for decades via false, fictitious, flowing information streams, “...*fraudulent statement or representation, or false writing or document with intent of misleading or otherwise hindering authority...*” coming from the SEC itself and SEC employees. SEC employees can be held accountable for what SEC employees do and do not do.

The Sec has no final order or authority; The SEC does what Congress tells it to do.

The SEC is asking that the Whistleblower Act update give the SEC sole approval to permanently bar Whistleblower Award applicants. Aside from not providing a folio of document samples the SEC staff are alleging issue with, the SEC is not, conversely, providing accountability standards for SEC employees breaking rules and/or laws, in the SEC whistleblower process and in dealing with Investment Clients victims and whistleblowers, ie turning SEC violators over to law enforcement.

There must a provided declaration of the violations of Rule 21F-8(c)(7). There should be a cure period. No bar should be permanent. The SEC whistleblowers materials must be returned to them to turn over to law enforcement to review if the SEC discretion to permanently bar alleged violators.

The SEC and FINRA/NASD have for Investment Advisors what are termed ‘bar’ periods ie 3 weeks, 3 months, where the Investment Advisors cannot work with a dues paying FINRA/NASD business league Securities Broker-Dealer member before the Investment Advisor can resume their Investment Advisor relationship with the Securities Broker-Dealer. The cure here for Whistleblowers the SEC staff rule request⁵⁰ of wanting to ban Whistleblowers from submitting future award applications, should be no different than the Industry ‘cure’, a cool down period followed by a ‘resume’ period.

The SEC staff must provide a “*denying Award*” form. Award denials must be explained in writing, signed by a staffer with their complete name printed and handwritten. Initials only are not acceptable. Psuedo names are not acceptable. ID Numbers without a name are not acceptable. The Whistleblower must receive a copy of that form explaining the reason for denial, the amount award the SEC staff decided, along with the SEC Final Opinion and hyperlink to the related Court case.

The Whistleblower is entitled to know the name of the SEC lawyers, investigators et al, just as one would know in a Court matter.

⁵⁰ Rule 21F-8(c)(7)

The Whistleblower is entitled to know the status of all parties the SEC whistleblower named to the SEC in the original complaint and updates.

The Whistleblower is to receive the name of related cases the SEC opened; status of related complaints the SEC did not pursue, and why.

SEC STAFF PROPOSAL IS NOTHING ABOUT PAYING OUT AWARDS TO CITIZEN WHISTLEBLOWERS, THE SEC STAFF PROPOSAL IS EVERYTHING ABOUT NOT PAYING AWARDS OUT TO CITIZEN WHISTLEBLOWERS TO KEEP THE MONEY IN THE IPF SLUSH FUND:

That the SEC staff writing the Whistleblower Act update proposal is inconsequential. What is more of consequence is that harmed Investment Clients and harmed Investment Advisors have "an issue" with SEC employees getting payments, pensions and other perks for not doing the job Citizen Whistleblowers are doing, reporting on crime, recidivous criminals, fraud coverups and protecting the global marketplace. Who cares about what the SEC staff think other than why are they not doing, knowing and understanding their job laid out clearly in the Acts of 1933, 1934 and 1940.

The SEC staff writing "a whistleblower who delays reporting to the Commission should expect that his or her "reward" for reporting might well be negatively impacted..." is blasphemous. The SEC squelched my tip and updates on the criminal even the SEC presiding ALJ Court Judge said is worse than Madoff. And the SEC sat on Madoff's crimes plus Madoff's parents crimes for 53+ years of more victims while the "violations were ongoing, whether investors continued to experience harm or the whistleblower continued to profit from the wrongdoing during the period of the whistleblower's delay or whether the delay had a discernable impact on the monetary sanctions that were ordered in the enforcement action", the SEC staff who wrote this bizarre Whistleblower Act update that was intended to seek coverup from my public disclosures on how the SEC Whistleblower Department is cheating Citizen Whistleblowers.

SEC did not address. Madoff, 50+ years. Bennett, 20+ years. First Command, since 1958.

The SEC did not turn Madoff over to cops, Bennett over to cops and even First Command the funder of the NASD/FINRA Educational Fund over to cops since 1958.

The audacity of the SEC staff to write in their proposal "...a whistleblower can have a debilitating impact on the Commission's ability to make a full recovery of ill-gotten gains and to obtain civil penalties and, in this way, delay may impair our ability to return funds to investors who have been harmed by the wrongdoing..." is hair wrenching. The SEC does not want to

restore funds to wronged investors. SEC former attorney now at the DOJ Michael Rinaldi thought he was funny goading with "you will not see a dime." Got to give Rinaldi this, Rinaldi was right with how the Whistleblower fund is structured to date. Moreso, SEC cannot force the funds from Investment Advisors to be repaid. Investment Advisors, you say? Yep. When is the last time you read Wall Street industry articles on the '*barred advisor of the week*'? Firms are not people.

Premier securities attorney Phillip Aidikoff told me way back in 1990's that collecting NASD awards rarely happen because of the way NASD/FINRA awards are structured by NASD/FINRA on the shell companies not on the people. Aidikoff would know. Aidikoff, the Chairman Emeritus of PIABA, the dues collecting business league for lawyers who do securities law, has been sitting on NASD/FINRA committees since as far back as then.

All it takes for this blockage to clear up is to have law enforcement sit down to read, review and write recommendations on the way forward for the FINRA/NASD and the SEC to channel suspected crimes directly to cops. Won't ever happen if FINRA/NASD have anything to do with correcting this wrong on Citizen Whistleblowers. The SEC and FINRA/NASD want to tighten the leak I kicked public on Citizen Whistleblowers awards carved down via '*policy*' written as law to cut Citizen Whistleblowers out of earned awards.

The SEC did not file S-3-16801 in to the courts to collect the funds, nor on Madoff in 1963, 1975, 2000 and those are just a few of the complaints not settled, expunged, denied, aged out of the SEC system.

"*Unreasonable delays*" are the SEC's doing running this '*regulator*' '*ALJ Court*' performance art scam for decades. SCOTUS confirmed are ALJ Courts are unconstitutional, tolling statutes that preclude Law Enforcement doing the job cops do if and once law enforcement learns about the crime.

Limiting whistleblowers to 180 days is intentional to coverup the crime and victim loss, to discredit the whistleblower. SEC freezing statutes of Respondents brought to the SEC ALJ Court. This is criminal. That said, this is the SEC. If you broke the law, would a Judge '*freeze*' your statutes? Nope.

"*Unreasonable delays*" is a two way street. When, not if, when the SEC does not turn a Securities Broker-Dealer or Investment Advisor over to another regulatory agency, the SEC is delaying that agency from beginning that agency's own investigation requirements which must be done for that agency to determine crimes under their regulatory oversight.

The SEC can only "*consider the nature, scope, and impact of the misconduct charged in the purported related action, and its relationship*" under federal securities laws.

The SEC bemoaning in the SEC Proposal⁵¹, the SEC might have to pay a Whistleblower award near the maximum \$240 million level under SEC existing rules asking “to reduce downward the hypothetical \$240 million to a hypothetical lower \$80 million minimum” is insane to think the SEC staff would ask such a question rather than to applaud the Citizen Whistleblower for making the SEC look good rather than failures at their work.

The SEC is honest, got to give them that, for writing “the request is made from deference to the SEC Securities Broker-Dealers who would be asked to make up the shortfall to the IPF, Investor Protection Fund...” I have no sympathy for the Securities Broker-Dealers needing to make up the shortfall based upon my experiences with RBC, JP Morgan and Western International Securities. They are after all the Superior Respondeat for what goes on under their Corporate umbrella.

Harvey Weinstein, Bill Cosby and other men are taking the fall for screwing with women, the same applies here too #CitizenWhistleblowersmetoo . A crime is a crime. Knowledge of a crime is a crime. Coverup of a crime is a crime. What is the SEC missing. Bottom line is if the SEC employees were diligent doing their job as written by Congress, these crimes that are caught would not be taking place.

The elephant remaining in the SEC room is the curating of cases to fit the window of time convenient to the SEC, that lawyers argue despite evidence otherwise in hand in an SEC ALJ court Congress had not written law for. Crimes go to cops and court.

The SEC writing, “...*We believe that the proposed rule language would provide additional clarity to potential whistleblowers to further alert them to the importance of following the procedures specified in Rules 21F-9(a) and (b)...*” is laughable. The SEC is not following the procedures Congress wrote. SEC has no authority from Congress to create policy. What counts is what Congress writes as law SEC must follow.

The SEC suggesting the SEC ‘entertains’ “[i]n considering an award determination pursuant to this rule, the Office of the Whistleblower and the Commission may rely upon the items specified in Rule 21F-12(a), an award application under Rule 21F-10 or Rule 21F-11...” is laughable unless you have documented, as a Citizen Whistleblower, what the SEC Philly ‘investigators’ and Lawyers do not produce, responsive to a Citizen Whistleblower FOIA request to confirm what the Philly office did or did not tell other SEC offices and staffers about.

300 or so pages responsive to months of paperwork provided to SEC former attorney Rinaldi were returned to that Citizen Whistleblower ‘balance and check’ request, only. The SEC staff has a credibility issue with the SEC staff. Rule of thumb. WHEN the Citizen Whistleblower sends documents, copies are kept, ‘balance and check’.

⁵¹ Rule 21F-6

There is no 'entertaining' by the SEC staffers as to who gets paid what. This is not guessing how many jelly beans in the Jelly Bean jar. Ahhh, yes I forgot... the SEC FOIA office sometimes 'cant find papers' or deems they searched long or hard enough. Not quite. There is the paper trail and not the FBI. FBI stance is they do the job the Special Agents are told to work on, so they email.

The SEC has no authority, no expertise to evaluate a Citizen Whistleblower individual's potential entitlement to an award yet the SEC staff think they do. The SEC OIG? Worthless to Citizen Whistleblowers. As wrote GAO employee Cynthia Hogue " *...If there are any issues in your allegations that relate to GAO programs and operations, we will take substantive action on your complaint. However, if the matter pertains to the conduct of employees of other federal agencies, your matter would be referred from our office, as our statutory authority is limited to programs and operations of the Government Accountability Office...* "

The GAO website states " *...The U.S. Government Accountability Office (GAO) is an independent, nonpartisan agency that works for Congress. Often called the "congressional watchdog," GAO investigates how the federal government spends taxpayer dollars...* "⁵² continuing " *...auditing agency operations to determine whether federal funds are being spent efficiently and effectively; investigating allegations of illegal and improper activities; reporting on how well government programs and policies are meeting their objectives; performing policy analyses and outlining options for congressional consideration; and issuing legal decisions and opinions, such as bid protest rulings and reports on agency rules. We advise Congress and the heads of executive agencies about ways to make government more efficient, effective, ethical, equitable and responsive. Our work leads to laws and acts that improve government operations, saving the government and taxpayers billions of dollars...* "

SEC staff that have been working in the SEC all the time these abuses have gone on are valueless. SEC staff that have come from the culture of FINRA/NASD are valueless to Investment Client protection and marketplace integrity. SEC staff work to cover up their corporate culture. FINRA/NASD staff work to cover up theirs and the SEC corporate culture.

Former SEC Commissioner Michael Piwowar is a celebration against that SEC and FINRA/NASD culture of celebrating not doing the job Congress limited the SEC too. Piwowar's sudden resignation was post being exposed for hustling Camp Pendelton serving military on investing, a conflict of interest since Commissioner Piwowar was overseeing Securities Broker-Dealers Investors Investment Clients sue.

There is no potential for credibility when trust is broken.

The SEC staff is asking for the Office of the Whistleblower would issue a Preliminary Summary Disposition⁵³ denying an application " *in lieu of the Preliminary Determination that the Claims Review Staff would issue...* " Adressed above, the staff are vested in Company culture of

⁵² <https://www.gao.gov/about/>

⁵³ Rule 21F-10 or Rule 21F-11

protecting the SEC hence lacking the 'arms length' needed for a judicial answer that does not favor the SEC staff employer, the SEC.

The recommendation that "a Claimant" should have a 30-day period to reply with a written response is a no-starter the way the SEC has things now. Post the submission of TIP and receiving the TCR, the Citizen Whistleblower is told to expect not to hear back from the SEC, citing confidentiality. Without a permanent track set up from the get-go through which the Citizen Whistleblower can follow their TIP, sorta like the USPS and FEDEX letting people track shipped packages in the system, the Citizen Whistleblower would have no way of knowing when that "30-day period to reply with a written response" begins or.... not. The SEC, as is the system currently, is gunning for the Citizen Whistleblower having no clue when to file "the timely written response", a failure the SEC is counting on in just the same way the system works, or is not working, with the WB-APP. The SEC wants to deny the award, have awards become Final Orders with no payout to Citizen Whistleblowers.

The SEC is not happy that 55 TIPS out of 700 actionable complaints received from over 22,000 submissions were paid out.

This 185 page proposal is a way to pay less. This is not rocket science.

CITIZEN WHISTLEBLOWERS ARE INVESTMENT CLIENT VICTIMS AND INVESTMENT ADVISORS WILLING TO BREAK THEIR NDAs, NON DISCLOSURE AGREEMENTS TO STAND UP FOR THEMSELVES & STRANGERS ARE PUBLICLY LIBELED #metoo:

Whistleblowing is not "an individual decision that is generally guided by a complex mix of pecuniary elements and non-pecuniary elements" as the SEC staffers wrote in their proposal.

There is a difference with what whistleblowers are. There are whistleblowers represented by lawyers submitting their tips to the Commission anonymously. There are citizen whistleblowers, public, these lawyers do not want. Citizen Whistleblowers are not a ticket to Federal government deep pockets. Citizen Whistleblowers are not looking for job security. Citizen whistleblowers are just men and women with a deep sense of ethics willing to stand up against personal attacks by the people intentionally doing wrong things harming good people, withstanding the loss of quality of life, the pushback, the doubters.

Whistleblowing are often victims of the crimes they whistleblow against or related to victims of the crimes and criminals. There is something sincere about supportive strangers reminding whistleblowers to continue doing the right thing.

Whistleblowers, as a result of their whistleblowing activities, do experience significant harmful consequences. Beyond ongoing large financial sacrifices, cost of pursuing the reporting of the

crimes, there are career-ending ramifications along with intended public shaming to embarrass the whistleblower. Lawyers and 3rd parties affiliated with the lawyers make threats against Citizen whistleblowers and their families. The NDAs non disclosure agreements and threats against whistleblowers are for their lifetime.⁵⁴ Citizen whistleblowers need lifetime protection⁵⁵ lasting a lifetime.

The SEC Acts allow the SEC to clear up FINRA/NASD DRS frauds and failed decision failures such as in my instance, found in Bad Faith⁵⁶ for telling the truth the SEC wants covered up. The SEC has repeatedly been asked for help, with no response.

There are penalties already on the books for Defamation and Libel. The SEC must write in to the updated Whistleblower Proposal penalties for SEC willful refusal and failure to restore Goodname and Goodwill to whistleblowers, compounded for each request the SEC refuses to take action for, or prevent, moreso when SEC employees are complicit in leading lines conversations in to the libel. The SEC must determine an Appropriate and upward ward level that is compliant with laws accordant to defamation, libel and repeated failure to take action over.

The "*HOODOO Investment Advisor*" is incarcerated pre-trial, unfortunately too late for the 8+ more years of victims that could have been saved from financial ruin but were not because of SEC decision to sit on credible information for almost a decade.

ANONYMITY, CONFIDENTIALITY & IDENTITY SHARING:

The SEC staff falsely allege in the Whistleblower Act update proposal that Citizen Whistleblowers seek anonymity, stating "...critically, the ability of whistleblowers to remain anonymous through the course of an investigation and resulting enforcement action..."

SEC Investigators 12-2-2-10 confirmation letter to me states, "...Although cooperation by the public furnishing information is very important in our work, our work is confidential..." continuing "...This is done to protect the integrity of an investigation from premature disclosure and to protect the privacy of persons with respect to whom unfounded charges may be made..." continuing "...Thus, subject to applicable division of the Freedom of Information Act, as amended, the existence or nonexistence of an investigation is generally not disclosed unless it is made a matter of public record in proceedings instituted before the Commission or in the courts. As a result, we will not be able to provide you with any future updates on the status of your complaint or of any pending Commission investigations..."

⁵⁴ Proposed Rule 21F-2(d)(1)(iii)

⁵⁵ Section 21F(h)(1)(A), clause (iii)

⁵⁶ <http://www.brokeandbroker.com/2313/finra-arbitration-attorneys-fees/>

The SEC writes it is their “...*experience to date has been that approximately one-half of the whistleblowers who have received awards for information regarding their current or former employers took advantage of the opportunity to submit their tips to the Commission anonymously...*” continuing “...*the ability to report anonymously is an additional attractive feature of our program that helps to encourage company insiders and others to come forward by lessening their fear of potential exposure...*”

Anonymity is not a Citizen Whistleblower decision to make. Often, the Citizen Whistleblower is left no choice but to be as public as the Citizen Whistleblower can on the crimes reporting on. Anonymity is not the whistleblowers choice. Anonymity covers up what the SEC is doing or not doing.

The SEC Whistleblower TIP Form sort of makes it clear that if no lawyer is fronting your complaint there is no anonymity so there is no heightened whistleblower confidentiality protections, wrong of the SEC staff to suggest differently.

The letter from SEC Investigators, the SEC Investigators tell Citizen Whistleblowers, SEC Investigators wont be getting back to the Citizen Whistleblowers, deceptive for the SEC staff to have written otherwise in the Whistleblower Act update proposal. Whistleblower documentation goes in to a black hole. Moreso, in an internet world. Everything online is copied, shared, curated, in limbo waiting to be abused usually as blackmail and threats.

Any suggestion that SEC officers or employees “...*shall not disclose any information, including information provided by a whistleblower to the Commission, which could reasonably be expected to reveal the identity of a whistleblower but they do...*” is mindboggling again. The SEC has a relationship with Thomson Reuters. Imagine my surprise when I got an “*out of the blue*” email from Thomson Reuters advising me how much my request was going to cost me.

What request? I never made one. I learned the SEC did then sent my name, contact details and request to Reuters.

Section 21F(h)(2) already allows the SEC to share information received from whistleblowers with “...*certain domestic and foreign regulatory and law enforcement agencies...*” That the statute requires domestic entities to “...*maintain such information as confidential, and requires foreign entities to maintain such information in accordance with such assurances of confidentiality as the Commission deems appropriate...*” in this world of gotcha, iphones and the Internet that Vint Cerf says 50+ years later has no security.

Not to worry, though. Section 21F(h)(2) allows the Commission to share information received from whistleblowers with “...*certain domestic and foreign regulatory and law enforcement agencies. However, the statute requires the domestic entities to maintain such information as confidential, and requires foreign entities to maintain such information in accordance with such assurances of confidentiality as the Commission deems appropriate...*”

Carrie Devorah
PUBLIC INVESTOR 12-03894
TELLING INVESTMENT CLIENTS & INVESTMENT ADVISORS THINGS WARREN BUFFETT DOES NOT KNOW TO TELL THEM
THAT WALL STREET DOES NOT WANT EXPOSED

The SEC did not tell the USPIS, the CFTC, the CFPB, Maxine Waters, Elizabeth Warren, Ed Markey etc.

Citizen Whistleblowers do.

THE SEC IS TAKING CRIMES AWAY FROM STATES & ATTORNEY GENERAL OVERSIGHT:

Securities Broker-Dealers and Investment Advisors are licensed state to state. Securities Broker-Dealers and Investment Advisors are under oversight of the State Securities Commissioners and State Attorney Generals.

States do offer Whistleblower awards to whistleblowers on crimes regulated by the States.

SEC oversight of Securities Broker-Dealers. The SEC modus operandi is to put forward Investment Advisors and Independent Contractors as accountable, protecting the Securities Broker-Dealers and Clearing Houses from the law. Investment Advisors are salesmen for the Securities Broker-Dealers. The Securities Broker-Dealers are Superior Respondeat.

The SEC and it's s.r.o. self-regulatory organization FINRA/NASD have flipped that.

Whistleblowers are entitled to receive payments from all levels of awards the Whistleblower reported on. A Uniform Communication code/language is needed to facilitate law enforcement understanding on a Criminal Code basis how the Investment Industry crimes relate to local and state approach.

Correcting the SEC and FINRA/NASD decades old deception is taking time. States are enforcement. Local is enforcement. FINRA/NASD is a private business with no authority to enforce, let alone to tell law enforcement to step down and let FINRA/NASD adjudicate complaints from customers. Law enforcement are understanding better.

There are crimes the s.r.o. perpetrated that should be corrected. SEC and FINRA/NASD Crimes perpetrated on serving military and veterans is despicable. Active duty military are being pulled in to the FINRA/NASD for arbitrations that are conducted telephonically, in itself, is despicable moreso when the Investment Client victim is scammed by an Investment Advisor. Investment Client victim disputes with Investment Advisor disputes are not oversight of the SEC or FINRA/NASD.⁵⁷

⁵⁷ https://www.finra.org/arbitration-and-mediation/investment_advisers

TIMELINE OF SELECTED DOCUMENTS EDUCATING WHY WHISTLEBLOWERS ARE ENTITLED TO EVERY PENNY OF AN AWARD & MORE. ATTACHMENTS PROVIDE INSIGHT IN TO WHAT WHISTLEBLOWERS GO THROUGH TO GET LAW ENFORCEMENT INVOLVED IN CRIMES AGAINST INVESTMENT CLIENTS:

S. 1869	Senate " <i>Whistleblower Protection Coordination Act</i> "
1963	FINRA/NASD Madoff Fine \$500 " <i>No Product</i> "
SEC Form WB-APP	
SEC Notice Of Covered Action Confirmation	
Office Of The Whistleblower	" <i>Claim An Award</i> " " <i>Notice Of Covered Actions</i> "
SEC Whistleblower Proposal	Page(s) 125-127, 136, 140-141 (re) mathematics of Whistleblower awards
DC Whistleblower Select Pages On Independent Contractors & Employees & DOL Fiduciary Rule	
12-2-2010	SEC Investigator Cindy Hoekstra Letter To SEC Requested Whistleblower Carrie Devorah (investment client) Confirming SEC Whistleblower SEC wrote for " <i>Bennett Group Financial Services</i> " While Devorah Reported More Firms and Individuals
Tue, Dec 14, 2010 at 11:07am	Email from SEC Requested Whistleblower Carrie Devorah (investment client) to DC DISB Department of Insurance, Securities & Banking employee Theodore Cross
Mon, Sep 25, 2017 at 9:33am	Email from SEC Benjamin Kalish Re Holding Companies
Thu, Mar 10, 2011 at 11:46am	Email from SEC Requested Whistleblower Carrie Devorah (investment client) to DC DISB Department of Insurance, Securities & Banking employee Theodore Cross

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Thu, Mar 17, 2011 at 3:54pm Email from DC DISB Department of Insurance, Securities & Banking employee Theodore Cross to SEC Requested Whistleblower Carrie Devorah (investment client)

Wed, Apr 27, 2011 at 11:00am Email from SEC Investigator Darren Goins to SEC Requested Whistleblower Carrie Devorah (investment client)

Mon, May 9, 2011 at 10:11am Email from DC DISB Department of Insurance, Securities & Banking Securities Financial Examiner Theodore Cross to SEC Requested Whistleblower Carrie Devorah (investment client) cc' Senayet Meaza stating *'file is not public information'*

[Author's Note: Consistently agencies crimes are reported to state the *'file is not public information'* hence whistleblowers cross file learning complaints are not shared with other agencies]

Wed, June 5, 2013 at 9:59am Email from former FINRA CEO Linda Fienberg to SEC Requested Whistleblower Carrie Devorah (investment client) to discuss arbitration matters of RBC, BGFS/WIS and FINRA

[Author's Note: Former FINRA DRS CEO Linda Fienberg resigned after I made this email public concurrent to media articles on FINRA/NASD being a Kangaroo Court⁵⁸]

Tue, Aug 6, 2013 at 1:30pm Email from IARDLIVE@sec.gov SEC Division of Investment Management, Investment Adviser Regulation Office to SEC Requested Whistleblower Carrie Devorah (investment client) Post Email to SEC Keith Kanyan (SEC cold call 1st contact)

Fri, Dec 20, 2013 at 9:12am Email from SEC Requested Whistleblower Carrie Devorah (investment client) to JP Morgan Julie Moy regarding RBC accounts

(i) [Author's Note: SEC Requested Whistleblower Carrie Devorah (investment client) was a whistleblower on both RBC et al, Bennett/WIS et al]

⁵⁸ <http://www.finra.org/newsroom/2014/dispute-resolution-president-linda-fienberg-retire-finra>



- (ii) 9-6-2017 Letter to JP Morgan requesting account history on check
- (iii) 7-24-09 RBC Statement indicating autopay from JP Morgan Chase
- (iv) RBC Dain Rauscher form sent for signing to Carrie Devorah by RBC Dain Rauscher Investment Advisor Scott Sangerman Account # ending in 7049
- (v) Pjwill5349@aol.com email address turns up in RBC account for SEC Requested Whistleblower Carrie Devorah (investment client). RBC had website changed
- (vi) JP Morgan employee Bryan Gasche modified SEC Requested Whistleblower Carrie Devorah (investment client) RBC account info on the encrypted CD sent by RBC attorney Carolyn Guy after forcing case settlement refusing to provide client account statements. Info was changed within 3 weeks after the FINRA/NASD DRS complaint was filed and led in to FINRA/NASD DRS, only for Securities Broker-Dealers not Investment Clients and Investment Advisors
- (vii) Bryan Gasche prior LINKEDIN profile. It was removed then replaced after the complaint was circulated by SEC Requested Whistleblower Carrie Devorah (investment client)
- (viii) SEC Requested Whistleblower Carrie Devorah (investment client) received this "client standard account agreement" on the encrypted CD received from RBC attorney Carolyn Guy. SEC Requested Whistleblower Carrie Devorah (investment client) address had no 522 in it.

Fri, Jan 10, 2014 at 10:14am

Email from JP Morgan Jamie Dimont Office stating "we are unable to locate accounts ending in 7049 and 1326"

RBC Wealth Management Check ending in #7049 issued by Carrie Devorah

February 10, 2014

Facebook friend of FBI Lawyer 1 (MD 8:17-cr-0472-PX) posts 'article' on FINRA 12-03894 ruling finding SEC Requested Whistleblower Carrie Devorah (investment client) in Bad Faith for telling the truth SEC and FINRA/NASD want covered up. FINRA/NASD 'code of

rules and procedures state FINRA/NASD DRS are to be withheld for 14 days post final decision. Piece was released within 10 days, the only record of the decision. 2012 *'arbitration'* is not a red dot on the finrabrokercheck timeline otherwise DRS would not have public record [Author's Note: SEC is a securities Broker-Dealer regulator only; FINRA/NASD is an SEC appointed Securities Broker-Dealer only DRS dispute resolution forum not for Investment Advisors and Investment Clients⁵⁹]

Thu, Mar 2014 at 9:42am

Email from JP Morgan Vice President Barbara Feigelman to SEC Requested Whistleblower Carrie Devorah (investment client) stating *"you are a client of Western International Securities Inc, a broker-dealer firm for which we provide clearance services on a fully disclosed basis..."*

[Author's Note: There is no contract with Western, the broker dealer. There is no contract with Bennett/BGFS, the Investment Advisor. There is a contract with JP Morgan Clearing. There is no mention of either WIS or BGFS in the JPMCC contract with SEC Requested Whistleblower Carrie Devorah (investment client). There is a contract between WIS and Bennett Financial Group an Independent Contractor, with Dawn Bennett as CEO. BFG is not the firm BGFS Investment Client victims hired. JPMCC had no contract to clear BGFS client cash. Broker Agreement 7-27-2009 between Securities Broker-Dealer Western International Securities and "Bennett Financial Group"]

[Author's Note: JP Morgan was providing "FOR JP MORGAN USE ONLY" Clearing Agreements to WIS to give to WIS Independent Contractors to have Investment Clients sign so Investment Clients were contracted to sue JP Morgan. Bennett/WIS victims had no contract with either Bennett or WIS. JPMCC makes it clear in emails the JPMCC relationship was with WIS not Bennett. As it turns out WIS clearing contract access to JPMCC was not with BGFS but with a different firm Investment Victims were not clients of. This information was provided to SEC, SEC investigators, SEC Rinaldi, FBI, and FINRA/NASD etc]

⁵⁹ https://www.finra.org/arbitration-and-mediation/investment_advisers

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Fri, Mar 28, 2014 at 12:32pm Fraud Report to USPIS [Author's Note: The postal service and the wires were used for the Frauds]

Tue, May 27, 2014 at 9:58am Email from CFTC Attorney-Advisor Judy Ringle advising CFTC has a whistleblower program

Thu, Jun 19, 2014 at 11:32am Email from SEC Requested Whistleblower Carrie Devorah (investment client) to CFTC following up to Submission 2014-06-09. CFPB was notified, too.

Fri, Aug 1, 2014 at 11:59am SEC Requested Whistleblower Carrie Devorah (investment client) emailed Congresswoman Eleanor Holmes Norton's longtime staffer Bradley Truding confirming meeting on FINRA/NASD & SEC covering up crimes. FINRA/NASD & SEC have brick locations in Holmes' Norton's District.

Wed, Aug 6, 2014 at 1:20am SEC Requested Whistleblower Carrie Devorah (investment client) sent follow up correspondence to Legislative staff SEC Requested Whistleblower Carrie Devorah (investment client) had met with 'whistleblowing' to Congress on FINRA/NASD & SEC complicity in covering up crimes against Investment Clients. Named staffers are from the offices of Rep Keith Ellison, Rep Eleanor Holmes Norton the District of Columbia's Congresswoman ("HOODOO Investment Advisor's crimes were operating from inside the District), Rep Maxine Waters currently chairing the House Minority Financial Services Committee

Thu, Aug 7, 2014 at 9:36am Rep Keith Ellison Acting Legislative Director Carol Wayman acknowledges receipt of SEC Requested Whistleblower Carrie Devorah (investment client) Aug 6, 2014 at 1:20am pre Meeting-FINRA Notes/Files email

Mon, Aug 18, 2014 at 4:20pm Email from DC DISB Department of Insurance, Securities & Banking employee Brad Kunzweiler to SEC Requested Whistleblower Carrie Devorah (investment client) cc'd colleague Senayet Meaza

[Author's Note: NASAA is a private business a 501(c)(3) affiliated with FINRA a private business 501(c)(6). NASAA is not government]

Wed, Sep 3, 2014 at 3:09pm Email from SEC Program Specialist Keith Kanyan directing SEC Requested Whistleblower Carrie Devorah

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(investment client) to contact SEC Requested Whistleblower Carrie Devorah (investment client) to SEC Office of Acquisition or SEC FOIA office to get copies of contracts

Fri, Sep 5, 2014 at 11:42am

Email from FINRA Senior Examiner Kevin Suh to SEC Requested Whistleblower Carrie Devorah (investment client) stating both exams- RBC Scott Sangerman and WIS Bennett closed without action. FINRA/NASD has no oversight over Investment Advisors and Investment Clients. FINRA/NASD takes the reported information, guides their dues paying business league member what to clean up.

As does the SEC, FINRA opened a Whistleblower Office⁶⁰ alleging 'expedited' review by FINRA. FINRA heard about Dawn Bennett from me pre 2103. Statement of Claim was filed in 2012.⁶¹

Bernie Madoff made it easier for cons to be covered up. Investment Client victims believed a tip would turn in to law enforcement action.

RBC was a credible tip from me.

Bennett/WIS was a credible tip from me.

Neither FINRA nor WIS reported the tips to cops.

Fri, Sep 5, 2014 at 12:36am

Email from FINRA Senior Examiner Kevin Suh to SEC Requested Whistleblower Carrie Devorah (investment client) misstated WIS eligibility in the District of Columbia. WIS was barred from DC until 4/5/2010 six months after SEC Requested Whistleblower Carrie Devorah (investment client) became a client.

Mon, Sep 8, 2014 at 3:04pm

Email from DC DISB Department of Insurance, Securities & Banking employee Lucinda Martin to SEC Requested Whistleblower Carrie Devorah (investment client) "recalled". Martin cc'd colleagues Theodore Miles, Maurice Goff, Brad Kunzweiler, Dena Reed, Senayet Meaza

⁶⁰ <http://www.finra.org/newsroom/2009/finra-announces-creation-office-whistleblower>

⁶¹ <http://www.finra.org/newsroom/2009/finra-announces-creation-office-whistleblower>

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[Author's Note: DISB is a state securities regulator responsive to laws Congress writes. DISB takes information from FINRA a private business as guidelines. FINRA is not government]

Mon, Mar 9, 2015 at 4:34pm

DC former City Attorney Bennett Rushkoff had been a contact for months. Rushkoff was aware I brought the FINRA matters and concerns to Congress. Rushkoff forwarded the fruits of my effort on the Hill, a bill proposed by Congressman Keith Ellison "*NINE GROUPS URGE FINRA TASK FORCE TO RELEASE DATA ON MANDATORY ARBITRATION FOR INVESTORS*"

[Author's Note: I figured out soon after how the "*mandatory arbitration for investors*" con was schemed making this bill obsolete]

Tue, Mar 24, 2015 at 11:34pm

Email from SEC Requested Whistleblower Carrie Devorah (investment client) to CFTC on RBC, FINRA and "*HOODOO Investment Advisor*"

[Author's Note: Documents provided by RBC to SEC Requested Whistleblower Carrie Devorah (investment client) indicate closed unfunded accounts were open being used for purchasing IPOs, options and KIDDS. CFTC sued RBC for money laundering.⁶² SEC Requested Whistleblower Carrie Devorah (investment client) BGFS/WIS/JPMCC accounts were kept open 2+ known years after accounts closed. SEC Requested Whistleblower Carrie Devorah (investment client) Scottrade accounts were discovered open 10+ years after accounts were closed. 2012, RBC post FINRA DRS provided encrypted CD with documents RBC knew Devorah accounts robbed for 10+ years mirroring another multi-state matter RBC settled in FINRA/NASD & SEC without crimes reported to law enforcement⁶³. Victims and RBC clients were not alerted to frauds in accounts. Victims were taken by FINRA/NASD & SEC in to FINRA/NASD dues paying business league Securities Broker-Dealer only account]

⁶² <https://www.cftc.gov/PressRoom/PressReleases/pr7086-14>

⁶³ www.dbo.ca.gov/ENF/pdf/2013/RBCCapMrkt_ConsentOrder.pdf

- Mon, Mar 31, 2014 at 4:55pm Email from DC DISB Claudine Alula to SEC Requested Whistleblower Carrie Devorah (investment client) cc'd Dena Reed re FOIA
- Tue, Jun 3, 2014 at 7:50am Email from Cynthia Hogue, GAO to SEC Requested Whistleblower Carrie Devorah (investment client)
- Thu, Jun 26, 2014 at 2:37pm Email from FINRA/NASD Sr VP and General Counsel Terri Reicher stating "*we will not be responding to you any further and I have instructed Dispute Resolution to forward any future voicemails, correspondence and email to me*" knowing FINRA/NASD is a Securities Broker-Dealer only forum not for Investment Clients and Investment Advisors⁶⁴. SEC Requested Whistleblower Carrie Devorah (investment client) is an Investment Client FINRA/NASD led away from Court where FINRA states online Investment Clients belong not in FINRA/NASD DRS a forum for Securities Broker-Dealer only
- Mon, Oct 6, 2014 at 3:17pm Email from JP Morgan Vice President Barbara Feigelman to SEC Requested Whistleblower Carrie Devorah (investment client) stating "*There will be no further comment from us on your email inquiry*"
- [Author's Note: SEC Requested Whistleblower Carrie Devorah (investment client) exposed JP Morgan was clearing Investment Client cash that JP Morgan had no contract to access to clear. JP Morgan had access to clear Western International Securities cash from Independent Contractor "Bennett Financial Group"]
- Tue, Mar 24, 2015 at 11:34pm Email from CFTC to SEC Requested Whistleblower Carrie Devorah (investment client)
- Mon, Mar 30, 2015 at 4:29pm Email from SEC Requested Whistleblower Carrie Devorah (investment client) to Washington Field Office FBI on RBC matter.
- Thu, Sep 17, 2015 at 12:55pm Email from SEC Requested Whistleblower Carrie Devorah (investment client) to former MPDC Chief Lanier and team

⁶⁴ https://www.finra.org/arbitration-and-mediation/investment_advisers

Carrie Devorah
PUBLIC INVESTOR 12-03894
TELLING INVESTMENT CLIENTS & INVESTMENT ADVISORS THINGS WARREN BUFFETT DOES NOT KNOW TO TELL THEM
THAT WALL STREET DOES NOT WANT EXPOSED

Fri, Oct 9, 2015 at 3:08pm

Email from SEC Requested Whistleblower Carrie Devorah (investment client) to legislators. Rep Keith Ellison Legislative Aide Carol Wayman requested to be bcc'd not cc'd

Tue, Oct 6, 2015 at 10:26pm

Email from SEC Requested Whistleblower Carrie Devorah (investment client) to what becomes an 'everyone' in trying to get the serious matter addressed. Preet Bharara's team was talked to. Washington Field office was talked to

Fri, Oct 16, 2015 at 2:13pm

Email from SEC Requested Whistleblower Carrie Devorah (investment client) to GAO Cynthia Hogue
[Author's Note: The GAO has oversight of government spending. Reporting the SEC et al to the GAO was a correct step in stopping these crimes against unsuspecting Investment Clients and Investment Advisors]

Thu, Jan 7, 2016 at 4:42pm

CFPB Whistleblower thanking SEC Requested Whistleblower Carrie Devorah (investment client) for contacting the CFPB (RBC/BGFS et al)

Thu, Feb 25, 2016 at 5:42pm

SEC Requested Whistleblower Carrie Devorah (investment client) email to former SEC attorney Michael Rinaldi lead on SEC 3-16801 responding to Rinaldi inappropriate comment(s)

Mon, Mar 14, 2016 at 5:43pm

Sat, Mar 26, 2016 at 6:19pm

Email from DoJ Shawn Weede to SEC Requested Whistleblower Carrie Devorah (investment client) cc'd to FBI Special Agent Keith Custer

Mon, Mar 28, 2016 at 3:38pm

Email from SEC Requested Whistleblower Carrie Devorah (investment client) to US DoJ Shawn Weede and FBI Special Agent Keith Custer. Weede introduced SEC Requested Whistleblower Carrie Devorah (investment client) to FBI Special Agent Custer.

[Author's Note: FBI Custer 2016 case includes Defendant DJB Holdings. SEC Requested Whistleblower Carrie Devorah (investment client) FINRA DRS 12-03894, filed in 2012, addressed DJB Holdings, 4+ years of more victims before FBI brought in by SEC. FINRA/NASD & SEC found SEC Requested Whistleblower Carrie Devorah (investment client) in Bad Faith alleging there was no case

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to SEC Requested Whistleblower Carrie Devorah
(investment client)'s claim. There was MD, 8:17-cr-0472-
PX]

Tue, May 31, 2016 at 3:01pm

Email from SEC former attorney Michael Rinaldi requesting a file "*to send securely*"

Thu, Jun 2, 2016 at 9:24am

Email from FBI Special Agent Custer to SEC Requested Whistleblower Carrie Devorah (investment client). USAO and FBI presented MD District Court Judge Paula Xinis defendant DJB Holdings was a 2013 startup company [Author's Note: DJB Holdings was addressed in FINRA DRS 12-03894. DJB Holding was not a 2013 startup as the SEC represented to USAO, FBI and MD District Court Presiding Judges]

Fri, Aug 5, 2016 at 4:17pm

Email to SEC Requested Whistleblower Carrie Devorah (investment client) directing SEC Requested Whistleblower Carrie Devorah (investment client) to "*make a written Freedom of Information Act, FOIA, request for the additional information that you are seeking...*"

Thu, May 5, 2016 at 12:01pm

OGIS, NARA, National Archives Records Administration Office of Government Information Services sends "Final Response" to SEC Requested Whistleblower Carrie Devorah (investment client) letter. SEC FOIA Appeals Office Directs FOIA Requesters to seek assistance from NARA OGIS

May 4, 2016- OGIS regurgitates SEC provided stated information further writing "*...OGIS carefully reviewed your submission of information and we understand that you submitted a request....AP 3-16801...expedited processing and a fee waiver... SEC FOIA determined...you did not demonstrate a "compelling need" to obtain the requested record on an expedited basis...Specifically, you asked OGIS for assistance in obtaining expedited processing... (page 2, dated 04/28/2016, page 1 is dated 05/04/2016) In working with agencies on cases similar to yours, we have learned that requesters must be able to provide the required elements for expedited processing and meet the required factors for fee waivers*... I understand that this is not the response and outcome you had hoped to receive...At this time, there is no further assistance that*

*OGIS can offer you in this case..., Sincerely, James VML
Holzer, Director, cc. John Livornese, FOIA Public Liaison,
SEC (requesting feedback at surveymonkey.com)”*

** The agencies, SEC, NARA and other agencies 'template'
answers as you see in this NARA response with Page 1
dated May 4 and Page 2 dated one month earlier 4/28*

*[Author's Note: The NARA OGIS employee Hirsch Kravitz
is correct. Kravitz's letter was not the answer I wanted.
Victims were actively being solicited and victimized 8+
years of more victims after the SEC asked me to be the SEC
Requested Investment Client Whistleblower, two only of the
Whistleblower parties- Investment Advisors out of the
Investment Advisors, Securities Broker-Dealer and
Clearing House- were arrested for the scam the USG
USAO testified to MD presiding Judge Paula Xinis is still
running, being directed from prison in 2018]*

Mon, Sep 25, 2017 at 9:33am

Email from Ben Kalish, SEC to SEC Requested
Whistleblower Carrie Devorah (investment client)
clarifying the SEC only can take action against Holding
Companies registered with the SEC. SEC defendants in 2nd
Bennett BGFS matter includes DJB Holding which was not
of SEC oversight

Thu, Nov 16, 2017 at 7:59pm

Email from Senate Judiciary Committee Republican
Oversight and Investigations staff Whistleblower to SEC
Requested Whistleblower Carrie Devorah (investment
client)

Thu, Dec 17, 2015 at 12:35pm

CFPB Whistleblower thanking SEC Requested
Whistleblower Carrie Devorah (investment client) for
contacting the CFPB (RBC/BGFS et al)

TCR: EMPLOYEE, INDEPENDENT CONTRACTOR, D.O.L.

The SEC staff Whistleblower Act update proposal pages provide Tables and numbers on pages
125-127, 136, 140-141.

Table 1 addresses awards of enforcement actions, estimates of current annual wages; Table 4 addresses "annual income generated by a twenty year annuity"; Table 5 addresses "annual income generated by a forty year annuity" that "we" the SEC "...calculate different annual incomes by varying the upfront payment from \$5 million to \$50 million increments and by varying the rate of return on the annuity from 2% per annum to 10% per annum in 2% increments..."; Table 6 addresses "annual income generated by a sixty year annuity; Table 7 addresses "annual income generated from a perpetuity..." continuing "...we assume that a lump sum upfront payment is invested in a perpetuity to generate annual income in perpetuity..." continuing "...we calculate different annual incomes by varying the upfront payment from \$5 million to \$50 million in \$5 million increments and by varying the rate of return on the annuity from 2% per annum o 10% per annum in 2% increments..."

The SEC staff further states "...the annuity figures in Tables 4 through 7 are consistent with our belief that the proposed \$30 million floor should not negatively impact the overall pecuniary incentives faced by most..."

Whistleblowers can only learn the status of the Whistleblower's TCR by filing FOIAs. There is no other way to learn.

There is no assigned contact person for Whistleblowers to check in with on their TCR status. The SEC should follow the IRS model of coding and tipping TCR numbers in a way for the Whistleblower to recognize what company, entities are connected to the Whistleblower.

The IRS goes further to facilitate the Whistleblower matching the TCR to the Tip sent in. The IRS set up is to provide a Master Number accompanied with a subset of numbers for the multiple persons/entities named in the Tip. Each subset number is accompanied with some letters from the name/identity of the person that subset number connects to.

Credible Citizen Whistleblowers update the SEC with additional documents as can be read in the accompanying TCRs. The IRS model allows the Citizen Whistleblower to mark the update correctly.

When a Whistleblower requests by FOIA the status of the Whistleblower's TCR from the SEC FOIA office, the FOIA office demands the Whistleblower FOIA requestor provide Identification the FOIA requestor is who the SEC Whistleblower office knows the FOIA requestor to be. Whistleblowers are demanded to provide their Identity with Identification.

There is no connection between the TCR numbers and the Citizen Whistleblower able to track their case. The SEC requires the Citizen Whistleblower to claim the Citizen Whistleblowers award using the Form WB-APP. Problem is the WB-APP form requirement is not detailed in the TIP sheet the Citizen Whistleblower filed.

The Whistleblower TIP Sheet must be a Uniform Sheet designed with and for Law Enforcement needs not the Code of Federal Regulations. This is not guesswork.

The SEC must place the WB-APP click button on the SEC Whistleblowing TIP sheet website, setting up a page similar to the SEC FOIA/APPEAL page.

The SEC staff preparing the Whistleblower Act update complain how Individuals seeking awards losing out on awards making mistakes in the filling out the Form WB-APP. There is no Handbook. A Handbook is needed.

Citizen Whistleblowers should be assigned 'Case Managers' as are in the Courts system.

Citizen Whistleblowers should be offered a "calendar" just like Judges provide to the Defense and Plaintiffs council in court settings.

The SEC staff wrote "...grounds for denial include, among other things, the fact that the individual did not comply with the form-and-manner requirements as specified in Rule 21F-9 for submitting information to be eligible for an award, or that the information was not used by the staff responsible for investigating, preparing and litigating the covered action and thus the individual's information did not "lead to" the success of the covered action..."

It is important to remember the SEC carves out what is "covered action." I was asked by the SEC to provide information on 1 Investment Advisory firm, 1 Clearing House, 1 Securities Broker-Dealer, Independent Contractors, Investment Advisors, two only of which the SEC took action against, that said, knowing the SEC has no authority from Congress for 'covered action' over those two Investment Advisors.

In that vein, Rules 21F-9(a) and (b), the SEC wanting to bar Citizen Whistleblowers from resubmitting same information to the Commission, is in appropriate considering when there are multiple people conspiring in crimes where the information is incorporate as in my experience where SEC curated its case down to 1 individual and 1 company then after that individual broke a Federal law the SEC opened a second case, naming that Individual, a conspirator and 2nd company I named beginning from back in 2010 to present date, stating in writing to the SEC I am entitled to each and every claim the SEC did not pursue back post 2010, names memorialized in to the DC District Court record 3+ years of more victims before the SEC took action and, did not call cops in then either.

Different agencies have different roles. The SEC is for Securities Broker-Dealers. The CFTC is for Commodities. The IRS is for Taxes, and so on. While the Citizen Whistleblower does legwork, there are different oversights the Citizen Whistleblower must prepare to maintain oversight of to quarterback for surety the criminal is caught and stopped. Not wanting to pay on Simultaneous Submissions to the Citizen Whistleblower is insulting in that there would be con conversation of these crimes in the Citizen Whistleblower's life if the SEC had been doing its job and told Cops at the getgo.

Moreso, the SEC is interfering in cases going to Law Enforcement, Cops and the DOJ. Turning crimes over to Cops is no "enforcement discretion" of the SEC. The Sec has no authority to determine what is a crime or frivolous.

Carric Devorah
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[REDACTED]

The SEC and the SEC Office of the Whistleblower have no authority to assess “*crime*” and awards, let alone deeming what is abusive and who is a “*repeat submitters.*” Not turning crimes over to cops is a crime.

Absolutely no Rule should be adopted to let the Commission bar any applicant, from seeking awards. SEC employees should be barred for what the SEC is doing to cover up tracks by barring people keeping the SEC accountable. Again, Elizabeth Holmes and Theranos are not under SEC oversight either as a Securities Broker-Dealer or qualifying Investment Advisory Firm; DJB Holding is not a Holding Company registered with the SEC; Lucia, Bandimere, Bennett and so many other Investment Advisors the SEC pulled in to SEC ALJ Courts away from city and State Cops are not Securities Broker-Dealers overseen by the SEC. The SEC has no oversight of Investment Advisors and Investment Clients. Congress should bar SEC employees complicit in coverups to be recommended for criminal charges under the law Main Street is accountable to. Moreso, returning past salaries, pensions and perks for having failed to do the job Congress write in the Criminal Code.

Citizen Whistleblowers will submit multiple Tips and award applications. Citizen Whistleblowers are entitled to every dime and more for picking up the slack on work SEC employees failed or did not know to do.

In my experience, the SEC has selective vision as to where the SEC sees crime. SEC Investigator Darren Goins said there was no merit (letter attached). 20+ years of AWC Acceptance Waiver Consents Signed with FINRA/NASD showed merit blocked by the SEC and failed oversight of the 501(c)(6) SEC approved for Securities Broker-Dealers only pulling Investment Advisor and Investment Clients away from Courts, JAMS and AAA, as stated on FINRA website.⁶⁵

“...FINRA Office of Dispute Resolution has received inquiries from lawyers who represent investors and those who represent investment advisers (IAs) which are not FINRA members about the availability of FINRA’s arbitration and mediation forum to resolve their disputes. Currently, such disputes are resolved in court or in non-FINRA dispute resolution forums...”

The Law requires Agencies let related agencies know about crimes. Through my experience and FOIA confirmation, the SEC is not information sharing, letting other agencies know about the crimes.

Living in the DMV, I presented my ID in person. Again.

I was making my request, again, and again and again. I have no confirming answer from the SEC still.

Mark Mensack, an SEC whistleblower, has no answer still.

Jacques Houssou, an SEC whistleblower, has no answer, still.

⁶⁵ https://www.finra.org/arbitration-and-mediation/investment_advisers

- August 16, 2013 SEC Requested Whistleblower Carrie Devorah (investment client) submitted data to the SEC OWB Office of Whistleblower
- Wed, Dec 4, 2013 at 7:45am D. Rivers in the OWB, Office Of Whistleblower emailed an *"acknowledgement letter as it pertains to your recent TCR submission..."*
- November 25, 2013 The TCR submission was dated two weeks earlier. The submission was given a TCR Submission number. There is nothing in the TCR Submission number identifying the named in the tip. I provided multiple named. The SEC curates cases to cut out industry preferred being protected, at the same time to deny full monies the whistleblower is entitled to.
- July 8, 2014 Submission dated- June 11, 2014 Signed by former director OWB, Sean McKessy
- The letter states *"...I addition we encourage you to submit any additional supporting information or materials that you believe will assist us in analyzing and fully understanding this matter..."* continuing *"...Members of the staff of the Division of Enforcement may contact you for additional assistance or information..."*
- The letter states *"...thank you again for taking the opportunity to submit your information to us..."* continuing *"...Efforts by persons such as yourself are critical to the success of this program..."*
- The letter had started *"...the success of the whistleblower program depends on individuals providing the Commission with specific, timely and credible information..."*

Whistleblowers can only learn the status of the Whistleblower's TCR by filing FOIAs. There is no other way to learn.

There is no assigned contact person for Whistleblowers to check in with on their TCR status.

I believed that until I no longer believed that.

The SEC Office of Enforcement never reached out to me.

The SEC Philly based "investigators" who are lawyers not trained investigators responded to me when I reached out to them, asking for more information and tips, still on the Voice Message.

I provided information updates.

I got TCR Submission confirmations.

The SEC investigators did not contact me to interview me.

The SEC lawyers did not contact me to interview me.

May 31, 2016

Submission dated, April 30, 2016

Signed by Jane Norberg, Deputy Chief OWB. TCR letter was updated to include *"As a matter of policy, the SEC conducts its investigations on a confidential basis. The purpose of this policy is to protect the integrity of any investigation from premature disclosure and to protect the privacy of persons involved in our investigations..."*

Jane Norberg's letter continues, *"...although working with whistleblower and their counsel is very important to us, there may be very limited information we can share with you regarding what action, if any, we are taking in response to your submission..."* continuing *"...I hope you understand these limitations..."*

Jane Norberg's letter continues *"...the Commission is only authorized to conduct investigations into possible violations of the federal securities laws..."* further stating *"...you should not expect the Commission to take any actions to the extent your information relates to conduct outside the scope or coverage of federal securities laws...."* adding *"...we may, however, in appropriate circumstances, refer your matter to another regulatory or law enforcement agency..."*

Jane Norberg's words *"...efforts by persons such as yourself are critical to the success of this program..."*

Mon, Sep 12, 2016 at 4:18pm

SEC Jeffrey Ovall emailed SEC Requested Whistleblower Carrie Devorah (investment client) question as to the status of her TCRs stating *"...Please note that the SEC conducts its investigations on a confidential basis and we are not able to provide updates on the status of a complain..."* continuing *"...if you are the person who submitted the whistleblower complaints, if you provide proof of identity as explained in the letter Mr. Jackson sent you today, we may be able to provide a small amount of information..."*

As of present date, I have not received the *"...small amount of information..."*

Tue, May 2, 2017 at 6:06pm

SEC Requested Whistleblower Carrie Devorah (investment client) emailed OWB director Jane Norberg, bcc'ing FBI Special Agent Keith Custer, demanding the SEC restore the value of the case. SEC Requested Whistleblower Carrie Devorah (investment client) had learned how the SEC curated case values down and away from the Whistleblower. SEC Requested Whistleblower Carrie Devorah (investment client) demanded the SEC clear her name of Bad Faith, the tool used inside the

FINRA/NASD Securities Broker-Dealer only DRS forum. SEC Requested Whistleblower Carrie Devorah (investment client) had made public the SEC and FINRA/NASD knew they were complicit in pulling crimes against Investment Advisors and Investment Clients away from cops.

SEC Requested Whistleblower Carrie Devorah (investment client) stated to SEC attorney Jack McCreery to *"...advise me how to collect 1- my portion of the ALJ decision award. I am a victim; - my whistleblower award for cooperating with the SEC since 2010..."* continuing *"...we do need to talk about the rest – the SEC's role. And what the SEC has yet to get right. And got wrong..."*

SEC Requested Whistleblower Carrie Devorah (investment client) ended up whistleblowing on the SEC. There is no mystery why SEC Requested Whistleblower Carrie Devorah (investment client) is in Bad Faith for telling the truth the SEC, FINRA/NASD, Wall Street want covered up.

There is no mystery why the SEC seeks to update the Whistleblower Act.

August 9, 2017 The new Deputy Chief of the Office of the Whistleblower Emily Pasquinelli confirmed to SEC Requested Whistleblower Carrie Devorah (investment client) receipt of *"Notice of Covered Action 2017-77 In The Matter Of Bennett Group Financial Services LLC, et al"* writing *"...The Office of the Whistleblower is evaluating your claim and may contact you if we need additional information..."*

Mon, Aug 21, 2017 at 1:00pm SEC Chief Jane Norberg emailed SEC Requested Whistleblower Carrie Devorah (investment client) responsive to an email SEC Requested Whistleblower Carrie Devorah (investment client) sent to a group of recipients in and out of the SEC. The SEC challenged SEC Requested Whistleblower Carrie Devorah (investment client) eligibility for the WB award.

What is the award for whistleblowing on the SEC scam?

Tue, Oct 24, 2017 at 11:12am SEC Requested Whistleblower Carrie Devorah (investment client) sent a group email to recipients in the SEC, FINRA/NASD, FBI, DOJ, Congress, Executive Office, MPDC, media & the USAO arguing MD 8:17-cr-0472-PX presenting incorrect facts to the presiding Judges Dawn Bennett was arrested by the FBI 8-25-2017.

Bradley Mascho was arrested soon after. Co-owner Tim Augustin was not arrested nor were the other accessories named to the SEC 2010 including but not limited to the Securities Broker-Dealer the SEC has oversight of, nor was Securities Broker-Dealer JPMorgan the SEC has oversight of, nor Royal Alliance the SEC has oversight of.

The SEC has no oversight of Investment Advisors.

The SEC has no oversight of Investment Advisory firms not meeting the SEC required benchmarks.

The SEC has no oversight of Ponzi schemers. The DOJ does. The SEC and FINRA/NASD has not been turning Ponzi schemers over to the DOJ. MD 8:17-cr-0472 is addressed in court records as a Ponzi scheme.

The SEC had no oversight of Pedro Fort Berbel, Ponzi scheme. The DOJ did.

The SEC had no oversight of Elizabeth Holmes, Ponzi scheme. The DOJ did.

The SEC had no oversight of Dawn Bennett and Bradley Mascho, Investment Advisors Ponzi schemes. The DOJ does.

The DC DISB and every state securities Commission regulator and Attorney Generals have oversight over the crimes in their state(s).

Local police financial crime units has oversight of financial crimes within those polices' jurisdiction. It starts with police officers. Police officers are the local enforcement. The FINRA/NASD and the SEC employees complicit in covering up crimes from local cops are subject to local laws first for local law violations; Attorney Generals have oversight of the FINRA/NASD and the SEC employees complicit in violation state law violations; the DOJ has oversight of FINRA/NASD and the SEC employees and lawyers complicit in Federal violations.

It starts with the local police, first and final. There is common ground. It is clear, cops fist, ground up. Every FINRA/NASD, SEC, lawyer and Judge complicit in the deceptions FINRA/NASD is enforcement as in the word 'law', that the SEC is enforcement as in the word law should be retired asap without salary and pension.

The SEC had no oversight of Bernard Madoff, William Murphy, Lucia, Bandimere, Investment Advisors. The DOJ does have oversight of Ponzi schemes and Investment Advisor crimes.

The DOJ has oversight over regulatory agency employees.

The DOJ provides victims of crimes with counseling and other services. The SEC and FINRA/NASD do not. The SEC and FINRA/NASD know the harm and mental health issues of being a financial fraud victim.

WHISTLEBLOWER LAWYERS & PROMOTED WHISTLEBLOWER ASSISTANCE:

There is sort of a Stockholm Syndrome in the SEC with SEC employees identifying with the Criminals and Defense Counsel rather than with the Citizen Whistleblowers putting themselves at risk as happened in my experience with former SEC attorney Michael Rinaldi.

I am surprised how out of touch the SEC staff Whistleblower Proposal update is with the reality that Whistleblowers experience. There is a big business in SEC Whistleblowers and other Federal agencies. In fact, there is a National Whistleblower Center Attorney Referral Network, besides

- 1- not every whistleblower is a Federal employee
- 2- not every whistleblower is represented by counsel.

A large of the SEC Whistleblower program failure is due to lawyers. The SEC alleges the SEC has no rules for lawyers. Lawyers are bound to local law. The SEC Whistleblower program must provide criminal charges for lawyers on local, state and federal. The Investment Act of 1940 does address "*aiding and abetting*" to rein lawyers in from giving Investment Client victims inappropriate representation, taking Investment Client victims in to FINRA/NASD DRS away from the Courts where they belong, in to the FINRA/NASD forum where records are destroyed, expunged and/or information aged out in the system. Lawyers work for their clients. Wall Street lawyers clients are Securities Broker-Dealers crafting rules for Securities Broker-Dealer client protection, ie. allowing destruction of records after 3-5 years by the SEC and its s.r.o. FINRA/NASD, and/or binding Investment Client victims to Confidentiality Agreements and Non-Disclosure agreements to silence claims from becoming public information.

The Bar associations cannot be relied up. Bar Associations like the DC Bar are 501(c)(6), dues collecting business leagues, like FINRA/NASD, protecting the rights of their dues paying members.

The SEC staff is incorrect on the a financial arrangements lawyers have with Whistleblower clients, alleging (iv) Counsel will bill on average: (i) three hours to complete a Form TCR, and (ii) two hours to complete a Form WB-APP.283. Some lawyers are paid by the hour. Some lawyers are paid on a contingency, a percentage.

The SEC staff segment on how lawyers are compensated makes sense. SEC lawyers jump ship to law firms that sue the SEC ie. former SEC Sean McKessy is at Phillips & Cohen immediately post leaving the Agency.

"...No whistleblower law firm knows the SEC whistleblower program better than Phillips & Cohen. Sean McKessy, a Phillips & Cohen partner who until last year was the Chief of the SEC Office of the Whistleblower, led the SEC's efforts to set up the program and its

policies and processes. For five years, he was in charge of evaluating whistleblower claims and making whistleblower reward recommendations... ”⁶⁶

I would have thought there would be a period of time McKessy would be bound to not take a position with a firm that sues the SEC.

Securities Broker-Dealers and Investment Advisors are licensed state to state. Attorney Generals should be notified state by state. Securities Broker-Dealers and Investment Advisors should be sued state by state for Qui Tam, False Claims and the other. Whistleblowers should be rewarded state by state.

The District of Columbia has False Claim laws. The statute of limitations is 10 years. The District Of Columbia rewards Whistleblowers.⁶⁷ The DC AG was notified about these crimes.⁶⁸

The presumption is all Whistleblowers are Industry. This is the farthest thing from the truth. Reality is there are Citizen Whistleblowers.

I am a Citizen Whistleblower.

‘Whistleblower’ lawyers ‘gather’ information from prospective whistleblower clients, ‘gather’ meaning the lawyers let Citizen Whistleblowers believe the cases will be taken, the Whistleblower explains detail of the case, send information the lawyers request to see. The lawyers walk away the richer with the Whistleblower’s information the lawyer benefits from, the lawyers use.

There is the disclaimer email from the lawyer that listening to the call and reading the documents does not mean the lawyer took the case, didn’t, and don’t forget your statutes tolling to file a claim

There are persons marketing themselves as “whistleblowers” presenting themselves to have a network of ‘lawyers’ they work with. There are never enough questions to ask to discern who is a genuine Whistleblower handler or there is more to the story.⁶⁹

⁶⁶ https://www.phillipsandcohen.com/whistleblower-practice-areas/sec-whistleblower-program-lawyers/?gclid=CjwKCAjwyrvaBRACEiwAcyuzRP5Sh_ZPNGi8S3IIdLMwK791Nmw2dROzTCyfgMRYPzkVsAJ8ANqIQBoCGVAQAvD_BwE

⁶⁷ <https://www.phillipsandcohen.com/district-of-columbia/>

⁶⁸ § 2-381.03. Attorney General for the District of Columbia investigations and prosecutions; powers of prosecuting authority; civil actions by individuals as qui tam plaintiffs; jurisdiction of courts. (a) The Attorney General for the District of Columbia shall investigate, with such assistance from other District agencies as may be required, violations pursuant to § 2-381.02 involving District funds. If the Attorney General for the District of Columbia finds that a person has violated or is violating the provisions of § 2-381.02, the Attorney General for the District of Columbia may bring a civil action against that person in the Superior Court of the District of Columbia

⁶⁹ <https://www.nbcnews.com/news/investigations/pro-obama-group-fires-fundraiser-who-diverted-felon-s-100k-n39491>

DOL: EMPLOYMENT . INDEPENDENT CONTRACTOR

Bennett FINRA created CRD and finrabrokercheck.org state Bennett was employed by Western International Securities.

Western International Securities agreements confirmed Bennett et al are Independent Contractors. The “contract” FBI Lawyer 1 provided in the FINRA DRS was not a contract relevant to the FINRA/NASD DRS between SEC Requested Whistleblower Carrie Devorah (investment client). The contract, provided by FBI Lawyer 1 was for a different entity unrelated to FINRA DRS 12-03894, Bennett Financial Group. The “*Broker Agreement*” contract is bate-stamped intentionally submitted knowing it was a false document in to evidence in a Securities Broker-Dealer only DRS forum without the correct submission agreements signed.

Calling an Independent Contractor an employee is a state and federal violation.

Calling an employee an Independent Contractor is a state and federal violation.

The Retail Investment Act of 1940 applies of 1940 states a lawyer found “*aiding and abetting*” is liable for jail and fine.

FINAL NOTES:

A recent Forbes article⁷⁰ states there are 1 billion reasons why the SEC Whistleblower program is effective.

The SEC thinks so, to, writing

“... “...Original information provided by whistleblowers has led to enforcement actions in which the Commission has obtained over \$1.4 billion in financial remedies, including more than \$740 million in disgorgement of ill-gotten gains and interest, the majority of which has been or is scheduled to be returned to harmed investors...”

continuing,

“After nearly seven years of experience administering the whistleblower program, we have identified various ways in which the program might benefit from additional rulemaking. We believe that the changes that we are proposing will build on the program’s success by continuing to encourage individuals to come forward and by permitting us to more efficiently process award applications, among other potential benefits...”

The SEC Whistleblower Act proposal claims falsely “...*the amendments are designed to help ensure that an eligible, meritorious whistleblower is appropriately rewarded for his or her*

⁷⁰ <https://www.forbes.com/sites/realspin/2017/07/18/one-billion-reasons-why-the-sec-whistleblower-reward-program-is-effective/#2b80eb893009>

efforts...” is less about the whistleblowers than it is about knowing the dirt whistleblowers dug up on Securities Broker-Dealers.

Encouraging individuals to come forward gives the SEC more opportunity to protect securities Broker-Dealer crimes and crimes of the ‘employees’ and Independent Contractors working for the securities Broker-Dealer.

From where I sit, my knowledge as an SEC Investment Client Whistleblower offering Comment on why the SEC Whistleblower program fails, there are 2 billion+ reasons why the SEC Whistleblower program is not effective nor, in my knowledge and opinion will ever be.

2018, the SEC staff who wrote the SEC 184 page Whistleblower Act modification proposal said, there are “... *three key tenets of the program...monetary awards, confidentiality, and retaliation protections...*” 22,000 disclosures of confidential Whistleblower complaints that were reported to the securities Broker-Dealers regulator, the SEC says.

22,000 other whistleblowers learning as I did that complaints I turned in to the SEC and FINRA/NASD turned over to the Securities Broker-Dealers to know what to cover up, go dark on... documented. A firm I was Investment Client whistleblower on let me know what they were told, twice, in a letter and in an email.

2009, the world listened as Harry Markopolous testified to legislators and lawmakers that Madoffs crimes were ongoing since the 1990s. The SEC has determined Harry is the benchmark for what qualifies as “*independent analysis*” as “...*as defined in our whistleblower rules (and explained further in this guidance) if submitted today...*” The SEC writes “...*Markopolos’s submissions included information that would qualify as*” Markopolos’s information was “*highly-probative...*” further stating that “...*Markopolous ‘his expertise as a certified fraud examiner and his knowledge of the options markets to demonstrate that Madoff’s purported investment strategy could not have produced his claimed investment returns...*”

Harry purported Madoff managed between \$3 billion and \$7 billion in assets.

I am not a certified fraud examiner. All I have to give the SEC are documents, found in plain sight the SEC did not know of nor did Preet Bharara’s team that wrote the counts up against Madoff.

The SEC writes “...*to be considered “analysis,” the whistleblower’s submission must include some insight—beyond the existence of the publicly available information—that is revelatory; that is, the whistleblower’s evaluation of the publicly available information should do the work of making known and opening up to view for the Commission the possible securities violations...*”

I found the papers proving Madoff’s crimes were known decades prior to Harry Markopolous. My discovery qualifies as “*revelatory*” on the SEC pretending the SEC had no clue about Madoff’s crimes.

My discovery makes me a whistleblower on Madoff's crimes predating Harry's claim. I have made that request to the SEC already and multiple times since.

I received no response unless this SEC request to silence credible whistleblowers with this proposal to block whistleblowers the SEC want silenced is my response from the SEC.

I put Madoff documents in one article I wrote, "*Congress Created Madoff*"⁷¹, before the former Governor of Virginia Terry McCauliffe. I wrote McCauliffe's way forward to give 100s of 1000s of Virginia felons back their voting rights. Moreso, I confirmed that Madoff told the truth, 1963, the Sec knew about 50+years of Madoff's crimes, before Bernard turned himself in.

I covered Markopolous' Congressional hearings. People think of Whistleblowers they think of Markopolous. I don't. I think of a man that did not tell lawmakers Madoff's crimes were known to the SEC and NASD since 1963. Harry did not tell lawmakers Madoff's parents crimes were known to the NASD and SEC since 1960 yet what Harry told Congress is what the Dodd-Frank Act call for the SEC Whistleblower Agency and Investor Protection fund are predicated upon.

Less than a decade later, I made public papers that told Congress, lawmakers, legislators, regulators, law enforcement, telling nose-to-nose there is a problem with the SEC for decades. I told Congressman Ed Royce at Reagan DCA, minutes later bumping in to Senator Al Franken, telling Al the same that Madoff's crimes were known to the SEC in 1963.

These crimes have gone on for decades. The only difference between Markopolous testimony and now is the increased sophistication for Industry avoidance, using victims funds, IPF.

The true cost of Madoff's crimes to Investment Victims will never be known.

The SEC states, "... *The Commission has received over 22,000 whistleblower tips since the inception of the program through the end of Fiscal Year 2017...*" continuing "... *The Commission has ordered over \$266 million in whistleblower awards to 55 individuals whose information and cooperation assisted the Commission in bringing successful enforcement actions and, in some instances, other enforcement authorities in bringing related actions against wrongdoers...*", the SEC clarifies "... *50 whistleblower awards to 55 individuals or joint whistleblowers...*", at least those are the numbers the SEC wants you to believe are true numbers. The SEC carves crime window to fit a crime timeline story SEC wants told⁷², a story that does not fit regulatory orders ie First Command, Madoff, Bennett.

22,000 tips leading to awards to 55 individuals?

The SEC Whistleblower Act update proposal stating the Whistleblower Act is "*twin goals of protecting investors and increasing public confidence in the markets*" is total crap. The Whistleblower Act proposal is '*all about the bro*', the brotherhood of Wall Street.

⁷¹ <http://www.centerforcopyrightintegrity.com/congress-created-madoff.html>

⁷² Exchange Act Rule 21F-820

Carrie Devorah

PUBLIC INVESTOR 12-03894

TELLING INVESTMENT CLIENTS & INVESTMENT ADVISORS THINGS WARREN BUFFETT DOES NOT KNOW TO TELL THEM
THAT WALL STREET DOES NOT WANT EXPOSED

The SEC employee proposal states “... *information and cooperation assisted the Commission in bringing successful enforcement actions and, in some instances, other enforcement authorities in bringing related actions against wrongdoers...*” continuing “...*After nearly seven years of experience administering the whistleblower program, we have identified various ways in which the program might benefit from additional rulemaking. We believe that the changes that we are proposing will build on the program’s success by continuing to encourage individuals to come forward and by permitting us to more efficiently process award applications, among other potential benefits...*”

further stating,

“...*Original information provided by whistleblowers has led to enforcement actions in which the Commission has obtained over \$1.4 billion in financial remedies, including more than \$740 million in disgorgement of ill-gotten gains and interest, the majority of which has been or is scheduled to be returned to harmed investors...*”

The SEC Whistleblower Proposal states does not state the true value of disgorgements of profits the SEC chose not to pursue, intentionally kept away from law enforcement. The SEC Whistleblower Proposal states the DOJ received \$450 million in criminal penalties, the Commission received \$350 million in disgorgement of profits further. The SEC Whistleblower Proposal fails to state the DOJ, the US Attorneys Office gets the case the SEC lawyers curated to fit the story the SEC wants told to District Court Judges. Documents are withheld. Facts are... misplaced.

FINRA/NASD and the SEC are for securities Broker-Dealers only, needing being said over and over again until it gets drummed in- not Investment Client victims and Investment Advisors.

The proposed Act is huge. Must be simplified down to a Handbook similar to the SEC Plain English writing handbook.⁷³

Proposed Rule 21F-2(a) must clarify in the whistleblower definition by whistleblower status is an individual who “*provides the Commission with information “in writing”*” clarifying “*in writing*” includes handwritten, electronic communication and voice protocol along with leaving room for emerging technological and other such digital innovations.

SCOTUS decisions pre 2018, pre EPIC v Lewis, SEC v LUCIA, must be revisited in light of documents given to the SCOTUS the SEC, FINRA/NASD covered up tainting case precedence moreso in light of the SEC pretending to be Cop when the SEC has no investigative or enforcement ability- like a dog or a bull with its cojones cut off.

The Whistleblower Proposal does not clarify if the disgorgement of profits was from Securities Broker-Dealers the SEC has oversight of or from Ponzi schemers, Investment Advisors and Investment Clients the SEC has no oversight of. The Whistleblower Proposal does not clarify on

⁷³ <https://www.sec.gov/pdf/handbook.pdf>

Carrie Devorah
PUBLIC INVESTOR 12-03894
TELLING INVESTMENT CLIENTS & INVESTMENT ADVISORS THINGS WARREN BUFFETT DOES NOT KNOW TO TELL THEM
THAT WALL STREET DOES NOT WANT EXPOSED

[REDACTED]

whom the DOJ received Criminal Penalties- the Securities Broker-Dealers the SEC took action against, or the Investment Advisors and Investment Clients the SEC has no oversight of.

One Hundred Fifteenth Congress
of the
United States of America

AT THE SECOND SESSION

*Begun and held at the City of Washington on Wednesday,
the third day of January, two thousand and eighteen*

An Act

To reauthorize and rename the position of Whistleblower Ombudsman to be the Whistleblower Protection Coordinator.

*Be it enacted by the Senate and House of Representatives of
the United States of America in Congress assembled,*

SECTION 1. SHORT TITLE.

This Act may be cited as the "Whistleblower Protection Coordination Act".

SEC. 2. REAUTHORIZATION.

(a) IN GENERAL.—Section 3(d) of the Inspector General Act of 1978 (5 U.S.C. App.) is amended—

(1) in paragraph (1)(C)—

(A) by redesignating clauses (i) and (ii) as subclauses (I) and (II), respectively, and adjusting the margins accordingly;

(B) by striking "Ombudsman who shall educate agency employees—" and inserting the following: "Coordinator who shall—

"(i) educate agency employees—";

(C) in subclause (I), as so redesignated, by striking "on retaliation" and inserting "against retaliation";

(D) in subclause (II), as so redesignated, by striking the period at the end and inserting the following: ", including—

"(aa) the means by which employees may seek review of any allegation of reprisal, including the roles of the Office of the Inspector General, the Office of Special Counsel, the Merit Systems Protection Board, and any other relevant entities; and

"(bb) general information about the timeliness of such cases, the availability of any alternative dispute mechanisms, and avenues for potential relief."; and

(E) by adding at the end the following:

entity regarding the timely and appropriate handling and consideration of protected disclosures, allegations of reprisal, and general matters regarding the implementation and administration of whistleblower protection laws, rules, and regulations.”;

(2) in paragraph (2), by striking “Ombudsman” and inserting “Coordinator”;

(3) by redesignating paragraph (3) as paragraph (4); and

(4) by inserting after paragraph (2) the following:

“(3) The Whistleblower Protection Coordinator shall have direct access to the Inspector General as needed to accomplish the requirements of this subsection.”.

(b) **RESPONSIBILITIES OF CIGIE.**—Section 11(c) of the Inspector General Act of 1978 (5 U.S.C. App.) is amended by adding at the end the following:

“(5) **ADDITIONAL RESPONSIBILITIES RELATING TO WHISTLEBLOWER PROTECTION.**—The Council shall—

“(A) facilitate the work of the Whistleblower Protection Coordinators designated under section 3(d)(C); and

“(B) in consultation with the Office of Special Counsel and Whistleblower Protection Coordinators from the member offices of the Inspector General, develop best practices for coordination and communication in promoting the timely and appropriate handling and consideration of protected disclosures, allegations of reprisal, and general matters regarding the implementation and administration of whistleblower protection laws, in accordance with Federal law.”.

(c) **REPORTING.**—Section 5 of the Inspector General Act of 1978 (5 U.S.C. App.) is amended—

(1) in subsection (a), by amending paragraph (20) to read as follows:

“(20)(A) a detailed description of any instance of whistleblower retaliation, including information about the official found to have engaged in retaliation; and

“(B) what, if any, consequences the establishment actually imposed to hold the official described in subparagraph (A) accountable;”;

(2) in subsection (b)—

(A) in paragraph (3)(D), by striking “and” at the end;

(B) by redesignating paragraph (4) as paragraph (5);

and

(C) by inserting after paragraph (3) the following:

“(4) whether the establishment entered into a settlement agreement with the official described in subsection (a)(20)(A), which shall be reported regardless of any confidentiality agree-

S. 1869—3

(2) **RETROACTIVE EFFECTIVE DATE.**—The amendment made by paragraph (1) shall take effect on November 26, 2017.

Speaker of the House of Representatives.

*Vice President of the United States and
President of the Senate.*

COMPLAINT FINAL 12/08/83
FINES & COSTS PAID 11/20/83.

Reporting Source: Firm
 Current Status: Final
 Allegations: VIOLATION OF NASD RULES 2230 AND 2110
 Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
 Date Initiated: 07/01/1983
 Docket/Case Number: COMPLAINT NO NY-802
 Principal Product Type: No Product
 Other Product Type(s):

©2015 FINRA. All rights reserved. Report # 81573-39239 about BERNARD L. MADOFF INVESTMENT SECURITIES LLC. Data current as of Tuesday, July 21, 2015

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www.finra.org/brwsr/protect

User Guidance



Principal Sanction(s)/Relief Sought: Censure
 Other Sanction(s)/Relief Sought:
 Resolution: Decision
 Resolution Date: 11/08/1983
 Sanctions Ordered: Censure
 Monetary/Fine: \$500.00
 Other Sanctions Ordered:
 Sanction Details: FINED IN THE AMOUNT OF \$500 AND ASSESSED COSTS OF THE PROCEEDING IN THE AMOUNT OF \$80.85. THE FINE AND COSTS OF THE PROCEEDINGS WERE PAID IN FULL IN NOVEMBER 1983.
 Firm Statement: THE FINDING OF A VIOLATION OF NASD RULE 2230 WAS LIMITED TO A TECHNICAL INFRACTION.

Disclosure 9 of 9
 Reporting Source: Regulator
 Current Status: Final
 Allegations:
 Initiated By: NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC.
 Date Initiated: 11/22/1974

NASD

MADOFF'S crimes were known by the SEC in 1963 50+ years before Bernie turned himself in.

Other Product Type(s):

Principal Sanction(s)/Relief Sought

Other Sanction(s)/Relief Sought

Resolution:

Decision

Resolution Date:

01/02/1975

Regulator Statement

NASDAQ COMPLAINT N-VS-88
FILED 11-22-74
ACCEPTED 12-4-74 PAID \$25.00

1975

View FINRA complaint here

User Guidelines



FINAL 1-2-75

Reporting Source

Firm

Current Status:

Final

Allegations:

INFORMATION NO LONGER AVAILABLE DUE TO AGE OF THE COMPLAINT

Initiated By:

NATIONAL ASSOCIATION OF SECURITIES DEALERS INC

Date Initiated:

11/22/1974

Docket/Case Number:

N-NV-88

Principal Product Type:

No Product

Other Product Type(s):

Principal Sanction(s)/Relief Sought

Other

Other Sanction(s)/Relief Sought

FINE

Resolution

Decision

Resolution Date:

11/19/1974

Sanctions Ordered:

Monetary/Fine \$25.00

Other Sanctions Ordered:

Sanction Details:

FINE IN THE AMOUNT OF \$25.00 NO OTHER INFORMATION IS AVAILABLE DUE TO THE AGE OF THE COMPLAINT.

No Product

\$ 2,500

OMB APPROVAL	
OMB Number	3235-0686
Expires:	March 31, 2021
Estimated average burden hours per response.	2

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, DC 20549**

FORM WB-APP

**APPLICATION FOR AWARD FOR ORIGINAL INFORMATION SUBMITTED
PURSUANT TO SECTION 21F OF THE SECURITIES EXCHANGE ACT OF 1934**

A. APPLICANT'S INFORMATION (REQUIRED FOR ALL SUBMISSIONS)

1. Last Name	First	M.I.	Social Security No.
2. Street Address			Apartment/ Unit #
City	State/ Province	ZIP Code	Country
3. Telephone	Alt. Phone	E-mail Address	

B. ATTORNEY'S INFORMATION (IF APPLICABLE - SEE INSTRUCTIONS)

1. Attorney's Name			
2. Firm Name			
3. Street Address			
City	State/ Province	ZIP Code	Country
4. Telephone	Fax	E-mail Address	

C. TIP/COMPLAINT DETAILS

1. Manner in which original information was submitted to SEC:	SEC website	Mail	Fax	Other
2a. Tip, Complaint or Referral number	2b. Date TCR referred to in 2a submitted to SEC / /			
2c. Subject(s) of the Tip, Complaint or Referral:				

D. NOTICE OF COVERED ACTION

1. Date of Notice of Covered Action to which claim relates: / /	2. Notice Number:
3a. Case Name	3b. Case Number

E. CLAIMS PERTAINING TO RELATED ACTIONS

1. Name of agency or organization to which you provided your information	
2. Name and contact information for point of contact at agency or organization, if known.	
3a. Date you provided your information / /	3b. Date action filed by agency/organization / /
4a. Case Name	4b. Case number

F. ELIGIBILITY REQUIREMENTS AND OTHER INFORMATION

1. Are you, or were you at the time you acquired the original information you submitted to us, a member, officer or employee of the Department of Justice, the Securities and Exchange Commission ("SEC" or "Commission"), the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the Office of Thrift Supervision; the Public Company Accounting Oversight Board; any law enforcement organization; or any national securities exchange, registered securities association, registered clearing agency, or the Municipal Securities Rulemaking Board? YES NO

2. Are you, or were you at the time you acquired the original information you submitted to us, a member, officer or employee of a foreign government, any political subdivision, department, agency, or instrumentality of a foreign government, or any other foreign financial regulatory authority as that term is defined in Section 3(a)(52) of the Securities Exchange Act of 1934 (15 U.S.C. §78c(a)(52))?

YES NO

3. Did you obtain the information you are providing to us through the performance of an engagement required under the federal securities laws by an independent public accountant?

YES NO

4. Did you provide the information identified in Section C above pursuant to a cooperation agreement with the SEC or another agency or organization?

YES NO

5. Are you a spouse, parent, child, or sibling of a member or employee of the Commission, or do you reside in the same household as a member or employee of the Commission?

YES NO

6. Did you acquire the information you are providing to us from any person described in questions F1 through F5?

YES NO

7. If you answered "yes" to any of questions 1 through 6 above, please provide details. Use additional sheets if necessary.

8a. Did you provide the information identified in Section C above before you (or anyone representing you) received any request, inquiry or demand that relates to the subject matter of your submission (i) from the SEC, (ii) in connection with an investigation, inspection or examination by the Public Company Accounting Oversight Board, or any self-regulatory organization; or (iii) in connection with an investigation by the Congress, any other authority of the federal government, or a state Attorney General or securities regulatory authority?

YES NO

8b. If you answered "No" to question 8a, please provide details. Use additional sheets if necessary.

9a. Are you currently a subject or target of a criminal investigation, or have you been convicted of a criminal violation, in connection with the information upon which your application for an award is based?

YES NO

9b. If you answered "Yes" to question 9a, please provide details. Use additional sheets if necessary.

G. ENTITLEMENT TO AWARD

Explain the basis for your belief that you are entitled to an award in connection with your submission of information to us, or to another agency in a related action. Provide any additional information you think may be relevant in light of the criteria for determining the amount of an award set forth in Rule 21F-6 under the Securities Exchange Act of 1934. Include any supporting documents in your possession or control, and attach additional sheets, if necessary.

H. DECLARATION

I declare under penalty of perjury under the laws of the United States that the information contained herein is true, correct and complete to the best of my knowledge, information and belief. I fully understand that I may be subject to prosecution and ineligible for a whistleblower award if, in my submission of information, my other dealings with the SEC, or my dealings with another authority in connection with a related action, I knowingly and willfully make any false, fictitious, or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious, or fraudulent statement or entry.

Signature

Date

Privacy Act Statement

This notice is given under the Privacy Act of 1974. We are authorized to request information from you by Section 21F of the Securities Exchange Act of 1934. Our principal purpose in requesting this information is to assist in our evaluation of your eligibility and other factors relevant to our determination of whether to pay a whistleblower award to you under Section 21F of the Exchange Act.

However, the information provided may be used by SEC personnel for purposes of investigating possible violations of, or to conduct investigations authorized by, the federal securities law; in proceedings in which the federal securities laws are in issue or the SEC is a party; to coordinate law enforcement activities between the SEC and other federal, state, local or foreign law enforcement agencies, securities self regulatory organizations, and foreign securities authorities; and pursuant to other routine uses as described in SEC-42 "Enforcement Files."

Furnishing this information is voluntary, but a decision not to do so, or failure to provide complete information, may result in our denying a whistleblower award to you, or may affect our evaluation of the appropriate amount of an award. Further, if you are submitting this information for the SEC whistleblower program and you do not execute the Declaration, you may not be considered for an award.

Questions concerning this form may be directed to the SEC Office of the Whistleblower, 100 F Street, NE, Washington, DC 20549-5631, Tel. (202) 551-4790, Fax (703) 813-9322.

General

- This form should be used by persons making a claim for a whistleblower award in connection with information provided to the SEC or to another agency in a related action. In order to be deemed eligible for an award, you must meet all the requirements set forth in Section 21F of the Securities Exchange Act of 1934 and the rules thereunder.
- You must sign the Form WB-APP as the claimant. If you provided your information to the SEC anonymously, you must now disclose your identity on this form and your identity must be verified

in a form and manner that is acceptable to the Office of the Whistleblower prior to the payment of any award.

- If you are filing your claim in connection with information that you provided to the SEC, then your Form WB-APP, and any attachments thereto, **must be received by the SEC Office of the Whistleblower within ninety (90) days of the date of the Notice of Covered Action to which the claim relates.**
- If you are filing your claim in connection with information you provided to another agency in a related action, then your Form WB-APP, and any attachments thereto, must be received by the SEC Office of the Whistleblower as follows:
 - If a final order imposing monetary sanctions has been entered in a related action at the time you submit your claim for an award in connection with a Commission action, **you must submit your claim for an award in that related action on the same Form WB-APP that you use for the Commission action.**
 - If a final order imposing monetary sanctions in a related action has not been entered at the time you submit your claim for an award in connection with a Commission action, **you must submit your claim on Form WB-APP within ninety (90) days of the issuance of a final order imposing sanctions in the related action.**
- You must submit your Form WB-APP to us in one of the following two ways:
 - By mailing or delivering the signed form to the SEC Office of the Whistleblower, 100 F Street NE, Washington, DC 20549-5631; or
 - By faxing the signed form to (703) 813-9322.

Instructions for Completing Form WB-APP

Section A: Applicant's Information

Questions 1-3: Provide the following information about yourself:

- First and last name, and middle initial
- Social Security Number
- Complete address, including city, state and zip code
- Telephone number and, if available, an alternate number where you can be reached
- E-mail address

Section B: Attorney's Information. If you are represented by an attorney in this matter, provide the information requested. If you are not represented by an attorney in this matter, leave this Section blank.

Questions 1-4: Provide the following information about the attorney representing you in this matter:

- Attorney's name
- Firm name
- Complete address, including city, state and zip code
- Telephone number and fax number, and
- E-mail address.

Section C: Tip/Complaint Details

Question 1: Indicate the manner in which your original information was submitted to the SEC.

Question 2a: Include the TCR (Tip, Complaint or Referral) number to which this claim relates.

Question 2b: Provide the date on which you submitted your information to the SEC.

Question 2c: Provide the name of the individual(s) or entity(s) to which your complaint related.

Section D: Notice of Covered Action

The process for making a claim for a whistleblower award begins with the publication of a "Notice of Covered Action" on the Commission's website. This Notice is published whenever a judicial or administrative action brought by the Commission results in the imposition of monetary

Office of the Whistleblower

Claim an Award

We post Notices of Covered Action for each SEC action where a final judgment or order, by itself or together with other prior judgments or orders in the same action issued after July 21, 2010, results in monetary sanctions exceeding \$1 million.

The inclusion of a Notice means only that an order was entered with monetary sanctions exceeding \$1 million. By posting a Notice for a particular case, we are not making any determinations either that (i) a whistleblower tip, complaint or referral led to the SEC opening an investigation or filing an action with respect to the case or (ii) an award to a whistleblower will be paid in connection with the case.

Subject to the Final Rules, individuals who voluntarily provided the SEC with original information after July 21, 2010 that led to the successful enforcement of a covered action listed below are eligible to apply for a whistleblower award.

Once a Notice of Covered Action is posted, individuals have 90 calendar days to apply for an award by submitting a completed Form WB-APP to the Office of the Whistleblower by midnight on the claim due date listed for that action. Please send completed forms to the Office of the Whistleblower by mail at 100 F Street NE, Mail Stop 5631, Washington, DC 20549 or by fax at (703) 813-9322.

Notice of Covered Action Updates

Sign up to receive notifications of new listings.

Email address

Contact Us

100 F Street NE
Mail Stop 5631
Washington, DC 20549
Phone: (202) 551-4790
Fax: (703) 813-9322

Notice of Covered Actions

Year:

-View All-

Notice No.	Action	Notice Date	Claim Due Date
JUNE 2018			
2018-56 New	In the Matter of Visium Asset Management, LP Administrative Proceeding File No.: 3-18473 Date Filed: May 8, 2018 Date of Qualifying Judgment/Order: May 8, 2018	06/29/2018	09/27/2018
2018-55 New	SEC v. SW Argyll Investments, LLC (d/b/a Argyll Investments, LLC), James T. Miceli, Douglas A. McClain, Jr., Amerifund Capital Finance, LLC, and Jeffrey Spanier Case Number: 12-cv-00646 (United States District Court for the Southern District of California) Date Filed: March 15, 2012 Date of Qualifying Judgment/Order: April 26, 2018	06/29/2018	09/27/2018
2018-54 New	SEC v. GC Resources, LLC and Brian J. Polito Case Number: 15-cv-01048 (United States District Court for the Northern District of Texas) Date Filed: April 6, 2015 Date of Qualifying Judgment/Order: May 7, 2018	06/29/2018	09/27/2018
MAY 2018			
2018-53	In the Matter of Altaba Inc., f/d/b/a Yahoo! Inc. Administrative Proceeding File No.: 3-18448 Date Filed: April 24, 2018 Date of Qualifying Judgment/Order: April 24, 2018	05/31/2018	08/29/2018
2018-52	In the Matter of PNC Investments LLC Administrative Proceeding File No.: 3-18426 Date Filed: April 6, 2018 Date of Qualifying Judgment/Order: April 6, 2018	05/31/2018	08/29/2018
2018-51	SEC v. Merrill Robertson, Jr., Sherman C. Vaughn, Jr., and Cavalier Union Investments, LLC Case Number: 16-cv-00667 (United States District Court for the Eastern District of Virginia) Date Filed: August 10, 2016 Date of Qualifying Judgment/Order: April 3, 2018	05/31/2018	08/29/2018
2018-50	SEC v. Capital Cover Bancorp LLC; Christopher M. Less aka Rashid K. Khalfani	05/31/2018	08/29/2018

SAMPLE FEW AGES

← NO TCR# from which Whistleblower can identify the way for SEC marked the T

Notice No.	Action	Notice Date	Claim Due Date
	Case Number: 15-cv-00980 (United States District Court for the Central District of California) Date Filed: June 19, 2015 Date of Qualifying Judgment/Order: March 22, 2018		
2018-49	In the Matter of The Dun & Bradstreet Corporation Administrative Proceeding File No.: 3-18446 Date Filed: April 23, 2018 Date of Qualifying Judgment/Order: April 23, 2018	05/31/2018	08/29/2018
2018-48	In the Matter of Panasonic Corporation Administrative Proceeding File No.: 3-18459 Date Filed: April 30, 2018 Date of Qualifying Judgment/Order: April 30, 2018	05/31/2018	08/29/2018
2018-47	In the Matter of Geneos Wealth Management, Inc. Administrative Proceeding File No.: 3-18425 Date Filed: April 6, 2018 Date of Qualifying Judgment/Order: April 6, 2018	05/31/2018	08/29/2018
2018-46	In the Matter of Securities America Advisors, Inc. Administrative Proceeding File No.: 3-18424 Date Filed: April 6, 2018 Date of Qualifying Judgment/Order: April 6, 2018	05/31/2018	08/29/2018
2018-45	SEC v. North Dakota Developments, LLC, Robert L. Gavin, and Daniel J. Hogan Case Number: 15-cv-00053 (United States District Court for the District of North Dakota) Date Filed: May 5, 2015 Date of Qualifying Judgment/Order: April 25, 2018	05/31/2018	08/29/2018
APRIL 2018			
2018-44	SEC v. Lucita A. Zamoras Case Number: 17-cv-02528 (United States District Court for the Northern District of Illinois) Date Filed: April 3, 2017 Date of Qualifying Judgment/Order: March 9, 2018	04/30/2018	07/29/2018
2018-43	SEC v. McKinley Mortgage Co. LLC, McKinley Mortgage Company, LLC, Tobias J. Preston, Charles G. Preston, Caleb J. Preston, and Laura A. Sanford Case Number: 18-cv-00616 (United States District Court for the Eastern District of California) Date Filed: March 22, 2018	04/30/2018	07/29/2018

Notice No.	Action	Notice Date	Claim Due Date
	Date of Qualifying Judgment/Order: March 27, 2018		
2018-42	In the Matter of Voya Investments, LLC and Direct Services LLC Administrative Proceeding File No.: 3-18393 Date Filed: March 8, 2018 Date of Qualifying Judgment/Order: March 8, 2018	04/30/2018	07/29/2018
2018-41	In the Matter of Maxwell Technologies, Inc., Van M. Andrews, David J. Schramm, and James W. DeWitt, Jr., CPA Administrative Proceeding File No.: 3-18408 Date Filed: March 27, 2018 Date of Qualifying Judgment/Order: March 27, 2018	04/30/2018	07/29/2018
2018-40	In the Matter of Steven Zoernack and EquityStar Capital Management, LLC Administrative Proceeding File No.: 3-17157 Date Filed: March 8, 2016 Date of Qualifying Judgment/Order: February 26, 2018	04/30/2018	07/29/2018
2018-39	In the Matter of Merrill Lynch, Pierce, Fenner & Smith Incorporated Administrative Proceeding File No.: 3-18392 Date Filed: March 8, 2018 Date of Qualifying Judgment/Order: March 8, 2018	04/30/2018	07/29/2018
2018-38	Matthew W. Fox and Wayne Energy, LLC Case Number: 17-cv-00271 (United States District Court for the Eastern District of Texas) Date Filed: April 19, 2017 Date of Qualifying Judgment/Order: March 8, 2018	04/30/2018	07/29/2018
2018-37	SEC v. Howard B. Present Case Number: 14-cv-14692 (United States District Court for the District of Massachusetts) Date Filed: December 22, 2014 Date of Qualifying Judgment/Order: March 22, 2018	04/30/2018	07/29/2018



UNITED STATES
 SECURITIES AND EXCHANGE COMMISSION
 PHILADELPHIA REGIONAL OFFICE
 Mellon Independence Center
 701 Market Street
 SUITE 2000
 PHILADELPHIA, PENNSYLVANIA 19106-1532

December 2, 2010



Ms. Carrie Devorah

[Redacted address lines]

Re: Bennett Group Financial Services

*gave the SEC investigators
 BGFS, WLS, JPMCC et al
 SEC investigators only named
 BGFS, not the Broker-Dealers*

Dear Ms. Devorah:

This is to confirm that we have received the documents that you sent to us relating to the above-referenced matter. Cooperation in furnishing information is very important to us in fulfilling our enforcement and regulatory responsibilities under the federal securities laws. Your documents have been referred to the appropriate people within the Commission.

This should not be construed as an expression of opinion on the part of the Commission or its staff that any violation of law has occurred, nor should it reflect adversely on the character or reliability of any person or entity or on the merits of any security involved.

Although cooperation by the public in furnishing information is very important in our work, our work is confidential. This is done to protect the integrity of an investigation from premature disclosure and to protect the privacy of persons with respect to whom unfounded charges may be made. Thus, subject to applicable provisions of the Freedom of Information Act, as amended, the existence or non-existence of an investigation is generally not disclosed unless it is made a matter of public record in proceedings instituted before the Commission or in the courts. As a result, we will not be able to provide you with any future updates on the status of your complaint or of any pending Commission investigations.

*FOIA
 hmmm*

Additionally, we are not authorized to render legal or financial advice, nor may we represent any individual in connection with the assertion of his personal claims or rights. You have the right to consult a lawyer to explore any remedies that may be available to you. To do so, however, you must initiate legal action promptly or you may lose your legal rights to recover funds.

55
(1)

Ms. Carrie Devorah
Page 2
December 2, 2010

I have enclosed an SEC Form 1662 that governs information given to the Commission.
Thank you for contacting the Commission and taking the time to send in your documents.

Very truly yours,

Cynthia Hoekstra

Cynthia Hoekstra
Attorney



?

they harassed me w/
phone calls after I
called the SEC to
ask how do you
prove you hired a
fee not a
Commissioner/IS

Enclosure:
SEC Form 1662



Carrie Devorah

note from Carrie Devorah RBC Capitol Markets Corp

WB = RBC

1 message

Tue, Dec 14, 2010 at 11:07 AM

[Redacted]

[Redacted]

Dear Mr. Cross

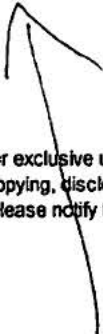
December 10 I received a letter from you stating you have not received my letter and papers on RBC. My papers were delivered. I sent you proof of service in a letter dated 11/23.

USPS tracking showed you received the letter 11/26, certified return receipt requested. I sent you a second set of papers yesterday. Return Receipt 7010 0290 0001 7941 7932. Please be on the lookout for the papers.

Sincerely
Carrie Devorah

[Redacted]

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this happens "a lot"
allege "never got the papers"
hence expenses of USPS
Certified mail.



Carrie Devorah

Re: Complaint Against RBC

1 message

Thu, Mar 10, 2011 at 11:46 AM

So the statements you are looking at are mine then?

On Thu, Mar 10, 2011 at 11:29 AM, Cross, Theodore V. (DISB) <theodore.cross@dc.gov> wrote:

I am still waiting for requested information from RBC.

Sent: Thursday, March 10, 2011 11:18 AM
To: Cross, Theodore V. (DISB)
Subject: Re: Complaint Against RBC

never got an answer from DISB. I did show them the statements RBC sent me 2012 5+ months past selling the FINTS DES. I had no documents. 20 I got Scott encrypted PDFs that show my identity was set since 2002 by RBC + JP Morgan employees

Dear Mr cross

I will answer when I return to my PC. Did RBC send you statements from 2002 to 2010 or just 2008? Also did they send you the Advisors agreement too?

Carrie

Sent on the Sprint® Now Network from my BlackBerry®

From: "Cross, Theodore V. (DISB)"
Date: Thu, 10 Mar 2011 11:11:22 -0500
To:
Subject: Complaint Against RBC

Ms. Devorah:

In reviewing some of the trade confirmations we received from RBC we noticed that trades (mostly purchases of securities) from your accounts between October 7, 2008 and December 2, 2008 were made. We want to verify whether or not Scott Sangerman had your authorized approval to make such trades during this period and if so, please provide supporting documentation such as an email or other written correspondence highlighting your approval. This information is needed to properly review your complaint against RBC and Scott Sangerman.

Your cooperation is very much appreciated. Thank you.

Preventing terrorism is everybody's business.

If you SEE something, SAY something.

Call the Metropolitan Police Department at (202) 727-9099 or email at SAR@DC.GOV to report suspicious activity or behavior that has already occurred.



Carrie Devorah [redacted]

Forwarded Emails from Theodore Cross Dept of DOI: Complaint Against RBC

1 message

[redacted]

Thu, Mar 17, 2011 at 5:34 PM

On Thu, Mar 10, 2011 at 11:11 AM, Cross, Theodore V. (DISB) [redacted] wrote:

Ms. Devorah:

In reviewing some of the trade confirmations we received from RBC we noticed that trades (mostly purchases of securities) from your accounts between October 7, 2008 and December 2, 2008 were made. We want to verify whether or not Scott Sangerman had your authorized approval to make such trades during this period and if so, please provide supporting documentation such as an email or other written correspondence highlighting your approval. This information is needed to properly review your complaint against RBC and Scott Sangerman.

Your cooperation is very much appreciated. Thank you.

Preventing terrorism is everybody's business.

If you SEE something, SAY something.

It is a slap in the face to read these words knowing how the DISB coped w/ these crimes

Call the Metropolitan Police Department at (202) 727-9099 or email at SAR@DC.GOV to report suspicious activity or behavior that has already occurred.

Call 911 to report in-progress threats or emergencies.

To learn more, visit <http://www.mpdc.dc.gov/operationtipp>.

Sincerely
Carrie Devorah
www.godinthetemplesofgovernment.com
www.facebook.com/godingovt
@godingovt

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Sec 1st case v Bennett 3-1680
re DS senayet meaza

Bennett provided financial advisory services to the Association's investment committee from 2006 to October 27, 2009. OIP ¶ 39; Ex. 175.

Bennett told OCIE examiners in 2011 that at that time she provided \$100 million in short-term cash management to the Association. Ex. 151. During her investigative testimony, Bennett stated that although she was terminated by the Association in October 2009, she had to "unwind [its] positions" and she "helped" Barton Groh, the Association's CFO and a personal client of Bennett's, "with some other issues." Ex. 361 at 56-57. As such, she claimed that her relationship with the Association continued through 2010 and 2011. *Id.* at 57. In support of this, Bennett provided records that purported to show that she participated in "[w]eekly [c]all[s]" with the Association up until April 2010, after Bennett Group was terminated in October 2009. *See* Ex. 179; Ex. 361 at 409. Bennett also claimed to have performed pension consulting services – "clean up, re-organize . . . paperwork . . . set up the investments" – on approximately \$6.5 million of the Association's assets. Ex. 361 at 203; *see* Exs. 80-82, 84.

Groh testified he was the CFO of the Association from January 2006 through October 2010 and the COO from then until April 2014. Tr. 79. As CFO, Groh was responsible for all the finances, internal controls, audit, and management of investment funds. Tr. 79. Groh testified that Bennett first managed \$7.5 million and later \$30 to \$35 million for the Association, with other advisors handling the remainder of the endowment. Tr. 80-83. Bennett Group did not manage \$100 million for the Association as short-term cash or in any other way; and while Bennett made a pitch to manage the pension plan, she was not selected for either the Association's pension or 403(b) retirement plan. Tr. 82-83. Groh also testified that at the time Bennett was terminated, Groh spoke with Bennett and made clear to her that she would no longer provide investment management services for the Association and there would be no further opportunities in the foreseeable future for her to do so. Tr. 84. On October 27, 2009, the date the Association terminated her services, the Association directed Bennett to immediately transfer all funds she managed to the Association's bank account. OIP ¶ 40; Ex. 175. When asked about the documentation of Bennett's claimed weekly calls, Groh testified that he did not initiate any calls to Bennett or anyone else at Bennett Group regarding the Association's investments. Tr. 85.

G. False statements to the District of Columbia securities regulator⁶

In October 2013, Senayet Meaza, Director of Market Examination for the District of Columbia Department of Insurance, Securities and Banking (District of Columbia securities regulator), wrote Bennett regarding the AUM claims in the June 2009 Barron's ranking. Ex. 87. The letter stated, in part:

no one took action
perjury in FINRA DE
DISB + in other me

⁶ Although Bennett was not charged with making false statements to the District of Columbia securities regulator, I may consider facts outside the OIP when assessing sanctions. *See Robert Bruce Lohmann*, Exchange Act Release No. 48092, 2003 SEC LEXIS 3171, at *17 n.20 (June 26, 2003) (permitting consideration of conduct not charged in the OIP for purposes of assessing sanctions).

SEC cannot charge w/ perjury
SEC is a regul
w/ no law enforcement
authority

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Mayor Muriel Bowser

DC.gov disb.dc.gov

Department of Insurance, Securities and Banking

The Department of Insurance, Securities and Banking has a new address: 1050 First Street, NE, Suite 801, Washington, DC 20002.

Department of Insurance, Securities and Banking



Office Hours

Monday to Friday, 8:15 am to 4:45 pm, except District holidays

Connect With Us

1050 First Street, NE, 801, Washington, DC 20002

Phone: (202) 727-8000

Fax: (202) 535-1196

TTY: 711

Email: disb@dc.gov



Ask the Commissioner
Agency Performance

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Market Examinations Division

Senayet Meaza, Director Market Examinations

The Market Examinations Division:

- conducts on-site examinations of all domiciled insurance companies, inspections of investment advisers broker-dealers, District-chartered banks and non-depository financial services institutions doing business the District of Columbia;

She never took a bus, an UBER, cab a bike to go look at the office from 2012 ->



What are you looking for today?



Menu

Mayor Muriel Bowser

DC.gov disb.dc.gov

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On-site Examinations of DC-registered Broker-Dealers and Investment Advisers

DISB conducts on-site inspections or examinations of DC-registered broker-dealers and investment advisers. DISB's on-site examinations follow the guidelines of the agency's risk-based examination program and are conducted on a surprise basis. DISB also has a "Meet and Greet" program designed for new investment adviser and broker dealer firms ("Registrants").

DISB "Meet and Greet" Program for New Registrants

*looks good on paper
self should be replaced w/mt
new to be they handles
investor*

Within 180 days of registration, DISB will contact new Registrants for this meeting. During this time, Examination Division staff introduces themselves to the Registrant, provides the Registrant with a copy of the investment adviser or broker dealer rules, describes the examination process, and answers any questions the Registrant may have about the examination process or the Department.

DISB On-site Examinations

All examinations, except for the initial Meet and Greet, are conducted on a surprise basis, meaning that the Registrant will not receive prior notice that the Examination Division will be conducting an examination. To minimize the disruption to your firm's business, DISB examiners conduct an extensive pre-examination review of your firm and its activities prior to the on-site inspection. Following the exam, there will be an exit interview and discussion with the manager about the preliminary findings and any issues that they have identified during the examination. If you are new to the examination process, there are ways you can prepare.

Tips for Preparing for Your On-site Examination

Although examinations are conducted on a surprise basis, there are still steps you can take to prepare for an examination:

1. Make sure that you have readily accessible all the books and records required by Rule 181 for IA's and Rule 120 for BD's, including documentation of your compliance program and activities.
2. Make sure that your files are reasonably organized and up to date so that the examiners can easily find the documents they need.
3. Be prepared to provide the examiners with a copy of your supervisory or procedures manual.

On the day of the examination, the examiners will need access to the following:

- A clear place to work and review documents,
- A copier, fax machine, or other electronic equipment that allows the examiners to bring or send documents back to their offices, and
- Appropriate personnel to be interviewed by the examiners –principals, supervisors and managers.

The key to a successful examination is cooperation. Examiners will be asking for a lot of documents and information, so work with the examiner to provide the material in the most efficient manner.

- Recommended Best Practices for Coordinated Investment Advisers Examinations

If you have any further questions about DISB's examination process, contact Senayet Meaza at Senayet.meaza@dc.gov or call (202) 442-4794. Please note, however, that information concerning specific inspections/examinations is generally non-public information that may not be disclosed.

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Gmail

Carrie Devorah [Redacted]

RE: Western International Securities FINRA (Matter of Bennett Group Financial Services/ Dawn Bennett)

1 message

Golins, Darren A. [Redacted]
To: carrie devorah [Redacted]

Wed, Apr 27, 2011 at 11:00 AM

Ms. Devorah,

I hope this email finds you well! In regards to your inquiry of Bennett Group Financial Services, LLC ("BGFS"), registered investment advisor. I have been in contact with the staff at BGFS and there are a couple of things I would like to clear up with you:

You stated your intent for hiring BGFS was for them to provide you investment Advisory services for a bundled fee. This bundled fee would include the investment management fee as well as any commissions related to executing trades in your account. This arrangement is typically referred to as a "Wrap Fee Program". BGFS is not a sponsor of nor do they provide investment advice for any Wrap Fee Programs. Additionally, you would have signed an Investment Advisory Agreement showing what services you would receive and what fee would be charged to your account. You mentioned and we confirmed that you did not sign such an agreement with BGFS. You did however open a brokerage account and provided Dawn Bennett with limited power of attorney to place non-discretionary trades on your behalf. The non-discretionary description means that BGFS would need your permission in order to execute trades on your behalf.

In terms of your account, I have reviewed your statements personally and verified that you were charged approximately \$10,000 in commissions up front when BGFS implemented your asset allocation for the two accounts. I have also verified that they disclosed this charge to you up front in an email and that you authorized them to make the transactions. Additionally, there was no transfer fee charged to your account by Western International Securities.

Also, I am aware of the history of Western International Securities and that of Donald Bizub. In terms of an affiliation between Western International Securities and BGFS: Bennett Group Financial is an independent Registered Investment Advisor, the employees of BGFS (Dawn Bennett, Stuart Rogers, etc.) are Registered Representatives of Western International Securities (the Broker/Dealer). There is no common ownership between the two entities which usually leads to them being affiliated. As registered representatives, Western has some supervisory jurisdiction over the broker/dealer aspects, but not full responsibility over BGFS.

I hope this clears up some of your concerns, please contact me if you have any further questions.

sec investigation never physically went to the office

Bennett caused TUV of manichaus

NEVER started bundled fee never heard of it then

opened NO such Discretionary Brokerage account

never heard of commission - BGFS + was only approved in fee never authorized them

Sincerely,

Darren A. Goins
Securities Compliance Examiner

U.S. Securities & Exchange Commission
Mellon Independence Center
701 Market Street, Suite 2000
Philadelphia, PA 19106

: This e-mail and any attachments are federal property and are to be considered confidential and privileged. If you are not the named recipient, or have otherwise received this communication in error, please notify us immediately by returning the entire e-mail. Under only strictly prescribed circumstances may the contents of this e-mail or its attachments be disclosed to any other person. Use of such information for any purpose and the storage or duplication of such information in any medium is strictly prohibited. Thank you for your cooperation.

From: carrie devorah [mailto:]
Sent: Tuesday, April 26, 2011 11:38 PM
To: Thomas, Robert S.
Cc: Goins, Darren A.; Bradly Marks
Subject: FYI: Western International Securities FINRA (Matter of Bennett Group Financial Services/ Dawn Bennett)

Dear Msrs Goins & Thomas

I took a moment to google Western International Securities and to look up Western International Securities on FINRA's Broker check. It seems Western International Securities has a history of being investigated by FINRA. I was not aware of Bennetts involvement with Western. Very clearly Bennetts website still says there is no affiliation between the two. Please search Donald Bizub and Western International Securities on FINRA.org

Sincerely

Carrie Devorah

carrie.devorah@sec.gov

@godingovt



Carrie Devorah [redacted]

RE: note from Carrie Devorah

1 message

Cross, Theodore V. (DISB) <[redacted]>
To: carrie devorah <[redacted]>
Cc: "Meaza, Senayet (DISB)" <[redacted]>

Mon, May 9, 2011 at 10:11 AM

Dear Ms. Devorah:

*A should be
would have seen earlier failed
job DISB was done*

Our investigation file is not public information. As previously cited in our April 29, 2011 email, you can get the information directly from RBC. Thank you.

*information from RBC came 5+ months after
the matter was settled in what I later learned is
a Securities Broker-dealer only forum not for
Investment Clients + Investment Advisors*

Theodore Cross

Securities Financial Examiner

Department of Insurance, Securities & Banking

810 First Street NE

Suite 701

Washington, D.C. 20002

email: [redacted]

ph: [redacted]

fax: (202) 576-6716

From: carrie devorah [redacted]

Sent: Wednesday, May 04, 2011 11:16 AM

To: Cross, Theodore V. (DISB)

Subject: note from Carrie Devorah

*DISB would not let me see my
statements the DISB said RBC
sent them.
Does I got in 2012 showed
ID theft + fraud even before
I became an RBC client*

Dear Mr Cross

I hope you are doing well.

Before you made your decision we spoke about the opportunity for me to review some of the documents regarding this matter. Some of the documents in you letter, I have no knowledge of. I hope your office would extend me the courtesy to review the documents. If you like you can mail me a copy or I can come down to review them in your office, which ever is easier for you.

I appreciate your time. I look forward to your response.

Sincerely

Carrie Devorah

www.godinthetemplesofgovernment.com

www.facebook.com/godingovt

@godingovt

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Call 911 to report in-progress threats or emergencies.

To learn more, visit <http://www.mpdc.dc.gov/operationtipp>.



Carrie Devorah [REDACTED]

meeting

1 message

Fienberg, Linda [REDACTED]
To: [REDACTED]
Cc: "Niedermayer, Jackie" [REDACTED]

Wed, Jun 5, 2013 at 9:59 AM

Dear Ms. Devorah,

I work with Rick Ketchum who has asked me to get in touch with you. I would be happy to meet with you at your convenience to discuss the matters that you raised in your email or to discuss your arbitration matters.

By way of background, I'm in charge of the arbitration/mediation program at FINRA; I also am the Chief Hearing Officer in charge of disciplinary hearings.

*She saws date
FINRA doc for
RBC + WIS/BGS*

Please let me know when would be convenient for us to meet in person or by telephone. I am free next Monday afternoon from noon on if that is good for you.

I look forward to hearing from you, Linda Fienberg

Linda D. Fienberg

President

FINRA Dispute Resolution

1735 K Street, NW

Washington, DC 20006-1506

tel 202 728-8407

fax 202 728-8833

www.finra.org



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(no subject)

1 message

Carrie Devorah - [redacted]

To: [redacted]

Fri, Dec 20, 2013 at 9:12 AM

Thank you Julie.

The numbers are [redacted]

paper is signed 1-20-08
paper is signed 12/31/07

I had made a note stating "This is the 3rd such transfer request I have signed-returned"

These are the only two of these papers I was provided with.

I want my complete history

Sincerely

CARRIE Devorah



Someone set up a check-up account for JP program confirmed 2014 the account never existed. Bot I was writing checks w/ this account number on it

DISCLAIMER :

With the continuing crossing and interfacing of platforms both on & off line both with & without our knowledge nor approval to note nothing sent over the internet anymore is ever private nor should be presumed to be so. If it is that much of a secret, say nothing. If you must? Take a lesson from our military- hand write the note, chew then swallow



Carrle Devorah [REDACTED]

JP Morgan Chase Executive Office

1 message

Compton, Brandon [REDACTED]
To: "carriedev@gmail.com" [REDACTED]

Fri, Jan 10, 2014 at 10:14 AM

Executive Office**CHASE** **We are unable to locate accounts ending in [REDACTED]**

Dear Ms. Devorah:

This is in response to your email to us about viewing your checking account activity online and your request to receive the complete history of accounts ending in [REDACTED]. We regret to hear you have contacted us multiple times to receive this information and apologize for any inconvenience experienced.

We researched our banking system

I can confirm our banking system and records were reviewed and we are unable to locate the referenced accounts in your name based on your social security number and the account numbers provided to us. We regret that we are unable to provide statements or other documentation reflecting the history of the accounts. Additionally, we were unable to locate an online banking profile in your name to determine information concerning viewing your checking account activity online.

Banks must abide by federal and applicable state record retention laws and may dispose of any records that have been retained or preserved for the period set forth in those laws. The record retention period governing an account is seven years. You may wish to visit www.unclaimed.org (searchable by owner name) or www.missingmoney.com to search for the accounts as they may have been escheated. You can search by "All States" and include your name. If a listing is found, you would submit the request through that state. Our records do not reflect we maintained or escheated these accounts.

We located a checking account in your name

We located information on checking account ending in [REDACTED] of which you were a joint owner. The funds in the account were escheated on November 10, 2010. We are required to report inactive or dormant accounts to the state of the account holder's last known address of record as abandoned or unclaimed property. Each state has specific years of inactivity to qualify as abandoned property. The

state of California requires Bank's to escheat, remit or transfer account balances and property to the State after a three-year period of inactivity. Should you wish to pursue collection of the funds, please contact the California Office of State Controller at 1-800-992-4647 or by email at www.sco.ca.gov/scocontactus/otherinquiries.aspx. You may also contact them at the address below:

California Office of State Controller
Unclaimed Property Division
P.O. Box 942850
Sacramento, CA 94250-5873

For your privacy, we are unable to send bank statements via email but we're happy to mail the final statement generated for the account to the address on your letter sent to my attention dated December 22, 2013.

Ms. Devorah, we hope this information is helpful. While we understand this matter is important to you, we regret we are unable to be of further assistance. Thank you for the past business you placed with us. I can be reached at 1-877-658-5560, extension 129-1038 should you have cause to contact me.

Sincerely,

Brandon Compton

Brandon Compton

Chase Executive Office

This transmission may contain information that is privileged, confidential, legally privileged, and/or exempt from disclosure under applicable law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of the information contained herein (including any reliance thereon) is STRICTLY PROHIBITED. Although this transmission and any attachments are believed to be free of any virus or other defect that might affect any computer system into which it is received and opened, it is the responsibility of the recipient to ensure that it is virus free and no responsibility is accepted by JPMorgan Chase & Co., its subsidiaries and affiliates, as applicable, for any loss or damage arising in any way from its use. If you received this transmission in error, please immediately contact the sender and destroy the material in its entirety, whether in electronic or hard copy format. Thank you.

DATE=12/08/2009 SEQUENCE=47129799

Account=[REDACTED] Serial Number=[REDACTED] Amount=\$398.00

CARRIE DEVORAH

5685

838

56-1551/441

Date 12-2-09

Pay to the order of

Carle First Blue Cross

\$ 398.00

Three hundred and ninety eight dollars

Dollars



RBC Wealth Management

Investment Access[®] Account

Expense Code

Carle

Payable Through

For

⑆0000039800⑆

SUNTRUST BLT 12082009
ORLANDO, FL
3249-014 ⑆663162152⑆

276 859579 89P111 02 0102 138 120809
138 120809 000102 138 00000000000903278357
2
CREDIT TO THE WITHIN NAMED PAYEE
LACK OF ENO GTD SUNTRUST BANK

26 Sep 17 - 1345

CARRIE DEVORAH

[REDACTED]
[REDACTED]
JP Morgan
PO Box 36520
Louisville, KY 40233
September 6, 2017

To Whom It May Concern

Enclosed is

- (1) a copy of my driver's license
- (2) a check from 12-2-2009.

I want an account history for September 2009 – March 2010, authenticating this enclosed check that is drawn against my Investment Account. Please confirm that my check #5685 was routed through the routing number [REDACTED] for the account # [REDACTED]

Please confirm the check was "payable through JP Morgan Chase, NA Delaware.

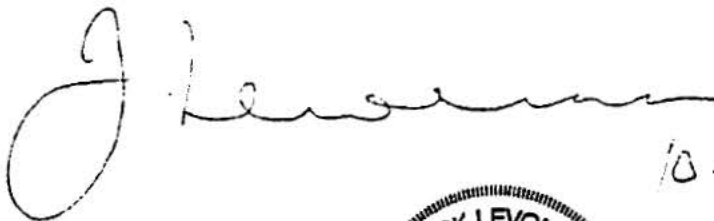
Send me the account opening papers. Notate for my memory, my advisor at the opening and closing of my account.

Thanking you in advance

Sincerely



Carrie Devorah



10-7-2017



CARRIE DEVORAH



Account number:



Page 4 of 8

ASSET DETAIL

* The Unrealized Gain/Loss may not reflect your investments' total return. Specifically, the net cost does not include dividend and capital gains distributions which have been reinvested. Additionally, the information that appears in these columns may be based on information provided by you or at your direction. RBC has not verified such data. Please see "About Your Statement" on page 2 for further information.

Your Financial Consultant has elected to display Asset Detail with the following options: asset purchases (tax lots) listed individually, reinvested dividends and capital gains distributions consolidated, and the cost of reinvested dividends and capital gains distributions excluded from totals.

CASH AND MONEY MARKET

DESCRIPTION	SYMBOL/CUSIP	QUANTITY	MARKET PRICE	CURRENT MARKET VALUE	PREVIOUS STATEMENT MARKET VALUE	YTD INCOME
PRIME MONEY MARKET FUND RBC INVESTOR CLASS	TPMXX	4,848.790	\$1.000	\$4,848.79	\$31,829.93	\$2.35
TOTAL CASH AND MONEY MARKET				\$4,848.79		\$2.35

ACTIVITY DETAIL

Realized gain/loss column includes fees and commissions. It does not include accrued interest.

Purchases, sales and other activity all represent an exchange of cash and/or money market funds for securities and, as such, do not represent deposits to or withdrawals from your account. Account value changes due to commissions, mark ups, mark downs and accrued interest are shown in the "Change in value of priced securities" line of the Account Value Summary.

* Information that appears in these columns may be based on information provided by you or at your direction. RBC has not verified such data. Please see "About Your Statement" on page 2 for further information.

DEPOSITS

Cash deposits

DATE	DESCRIPTION	AMOUNT	COMMENTS
07/08/09	TFR FROM CARRIE DEVORAH LIVING U/A DTD 12/11/1992 TRANSFER ASSETS IN	\$1,000.00	
07/24/09	AUTOPAY FROM JPMORGAN CHASE BANK, NA AUTOPAY FROM	\$5,000.00	
Total cash deposits		\$6,000.00	
TOTAL DEPOSITS		\$6,000.00	



RBC
Dain Rauscher

Member NYSE/SIPC

* **1101** **6** **BH56**
Firm ID Account Number FC #

SET-UP FORM:

ELECTRONIC FUNDS DEPOSITS/PAYMENTS (ACH)

Financial Consultant Name: S. SANGERMAN



RBC Dain Rauscher Account Information

Account Title (as shown on client statement)

CARRIE DEVORAH LIVING TRUST

Bank Account Information

Attach a voided check for account verification (not a deposit ticket)

Bank Name: JP MORGAN CHASE

Account Name: CARRIE DEVORAH

Account Type: Checking Savings

Transit Routing #: 044115511

Account # [REDACTED]

Deposits/Incoming ACH

Systematic Deposits to RBC Dain Rauscher account from bank account

Start Date: _____ End Date: _____ \$ _____
(Not Required)

Weekly Biweekly Monthly Quarterly Semi-Annual Annual

Start Date: _____ End Date: _____ \$ _____
(Not Required)

Weekly Biweekly Monthly Quarterly Semi-Annual Annual

For Branch Use ONLY - Contribution Code for Retirement Accounts: Current Year Prior Year

Payments/Outgoing Electronic Funds

Dividend/Interest/Retirement Distribution

Currently scheduled PAYMENTS to bank account

Dividend/Interest Retirement Distribution Money-Market Dividends
Branch must change account coding to 4C or 4F *Distribution form must be submitted to Retirement Operations*

Systematic Payments from RBC Dain Rauscher account to bank account.

(Section below not for Retirement Distributions. You must use the Retirement Distribution Form)

Start Date: _____ End Date: _____ \$ _____
(Not Required)

Weekly Biweekly Monthly Quarterly Semi-Annual Annual

Start Date: _____ End Date: _____ \$ _____
(Not Required)

Weekly Biweekly Monthly Quarterly Semi-Annual Annual

On-Demand Telephone Authorization (Not available for Retirement Accounts)

By initiating here, I/we authorize RBC Dain Rauscher to effect On-Demand transactions consistent with current agreement terms & conditions. This choice indicates that a telephone (on-demand) authorization has been designated for this account. Authorized persons are permitted to transfer, deposit or pay money from or to this account in varying amounts on the basis of instructions provided solely over the telephone.

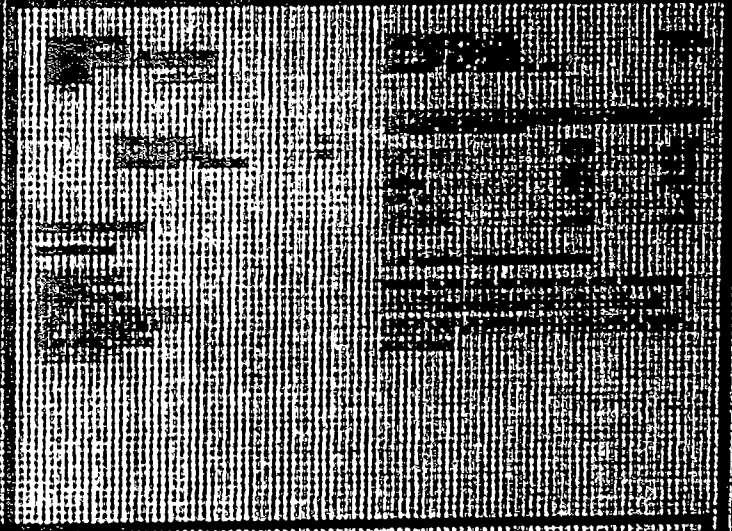
NOTE: If a distribution falls on a weekend or bank holiday, the transaction will be processed the next business day. RBC Dain Rauscher Inc. ("RBC Dain") can initiate credit or debit entries to the account specified above. The bank identified in this authorization will accept such credit or debit entries to the specified account, without responsibility thereof or the existence of any subsequent authorization relating thereto. This new deposit/transfer will start within thirty (30) days thereafter. I/we understand that scheduled payments to a bank account may vary in amount depending on the amount of dividends and interest available in the RBC Dain Rauscher account, and any prior notice of such a variation is waived.

- I understand that my use of ACH Services is subject to the terms and conditions of the Customer Authorization and Agreement for Electronic Funds Deposits/Payments (Automated Clearing House) Services and Disclosure (the "Agreement").
- I have received and reviewed a copy of the Agreement.
- The Agreement has not been amended, altered or revised in any way by me, and I agree to be bound by, and to comply with, its terms and conditions in their entirety.

[Signature] 6/8/06
Authorized Signature Date Authorized Signature (if Joint Account) Date

Financial Consultant Signature Date Branch Director & Assistant Complex Manager Date

RBC Dain is entitled to rely upon the information provided in this form until written notice of its revocation is delivered to us.



112

Type: Adobe Acrobat Document

Author: Riyaz Gattis

www.RSGattis.com

Subject: Client Statement

Date Modified: 12/8/2010 5:41 PM

Size: 7.74 MB



100 1

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Bryan Gasche

Technology Director, JPMorgan

Tampa/St. Petersburg, Florida Area Financial Services

Current JPMorgan

Previous HSBC, Royal Bank of Canada (RBC Dain Rauscher)

Education University of Minnesota

Connect



143 connections

www.linkedin.com/pub/bryan-gasche/9/65a/332

Background

Summary

Specialties: Building & managing global technology teams
 Multi-platform application design & integration (zOS, Tandem & Java/Unix)
 Global funds transfer
 Brokerage back-office & securities clearing/settlement
 Banking and Financial Services
 Document composition technologies
 High-volume print & mail technology solutions

Experience

Technology Director

JPMorgan

November 2006 – Present (7 years 6 months)

JPMorgan Treasury Services

Manager, Business Systems

HSBC

2004 – 2006 (2 years)

Global Systems, Document Services

Sr Developer

Royal Bank of Canada (RBC Dain Rauscher)

August 1995 – March 2004 (8 years 8 months)

Skills & Endorsements

Top Skills

19 Banking

14 Financial Services

10 SDLC

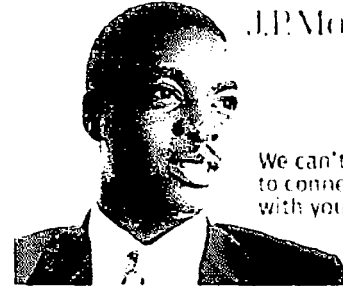
@ >



This person knows 1 or more people who can introduce you to Bryan



Bryan 3+



J.P. Morgan

We can't wait to connect with you.

▶ Discover our opportunities.

People Also Viewed

Luke Morando

Managing Director, Clearing Technology at JP Morgan

David Gollins

VP at JPMC

Kevin McNeil

Managing Director - JPMorganChase

Beata Shephard

Technology Project Manager at J.P. Morgan

Rachana Krishnaiah

Software Developer in Test

John Castano

Vice President, IT Quality Assurance at JPMorgan Chase

Jason Brown

Vice President Technology Project Manager at



RBC
Dain Rauscher

Member NYSE/SIPC

11101

Firm ID

[Redacted]

Account Number

BH56

FC#

CLIENT STANDARD ACCOUNT AGREEMENT

page 1 of 3

CARA DEBRA MARKS, TTEE

CARA DEBRA MARKS LIV TR UAD 12/11/92

Name & Address

CARA DEBRA MARKS
[Redacted] Suite 522
Beverly Hills CA 90212-1671

Name & Address II

not the address I used
PO BOX
RWPA was a
broker

As used in this Agreement, the terms "you", "I", and "me" refer to the client of RBC Dain Rauscher Inc. who seeks to open a standard account agreement, and the term "RBC Dain" refers to RBC Dain Rauscher Inc. In consideration of your continuing or now and hereafter opening an account or accounts for the purchase and sale of securities and commodities for me, or in my name, I agree that all transactions with respect to any such account shall be subject to the following terms:

1. Client Representations.

(a) If you are an individual, you represent and warrant that you are of legal age, that no one except you has an interest in your account and you are not an employee of any exchange or of a member firm of any exchange or the National Association of Securities Dealers, Inc. ("NASD"), any other self-regulatory organization, or of a bank, trust company, or insurance company unless you have notified RBC Dain to that effect, and you will promptly notify RBC Dain if you become so employed.

(b) If you are a corporation, trust, partnership or other entity, you represent and warrant that you are duly formed and existing under the laws of your state or jurisdiction of formation and are qualified and (if you are a corporation) in good standing in every jurisdiction in which you do business; the person(s) designated to act for you have been duly authorized by all necessary and appropriate institutional action; such person or persons have full authority to execute this Agreement and all related documents on your behalf and to act for you in all matters regarding your account(s); RBC Dain may at all times rely on the fact of such authorization without any duty to investigate into either the authenticity or extent thereof of such authorization; and the party or parties designated as authorized signatories constitute(s) all of the proper and necessary authorized signatories.

2. Client's Obligation.

I agree to notify RBC Dain immediately upon receipt of my confirmation and/or monthly statement of any trades or transactions that were executed without my authorization, any transactions which are not properly reflected on my confirmation or monthly statement or any other activities or omissions by RBC Dain, its agents or employees that I believe to be improper. Unless I immediately object in writing, confirmations of transactions and statements for my account shall be binding on me. Any communications regarding errors or misunderstandings with respect to my account should be addressed to the Branch Manager of the branch office where my account is maintained.

3. Communications.

Notices and communications may be sent to you at your address given above or at such other address as you may hereafter give RBC Dain in writing, and all communications so sent, whether by mail, telegraph, messenger or otherwise, shall be deemed given to you personally, whether actually received or not.

4. Accuracy Of Account Information.

I agree to notify RBC Dain in writing of any material change in my financial circumstances or any change in my investment objectives. I will address such notice to the Branch Manager of the branch office where my account is maintained. Any information I give RBC Dain on or relating to this account will be subject to verification, and I authorize RBC Dain to obtain a credit report about me at any time and to share the credit report with any of RBC Dain's affiliates.

5. RBC Dain "Financial Consultant" Title.

The RBC Dain professionals who serve retail clients use the title of "Financial Consultant." This title was selected in recognition of the wide and expanding variety of financial products and services RBC Dain offers its clients. The term "Financial Consultant", as used by RBC Dain, is not intended to imply that its professionals are financial planners as the term is defined by certain state rules and regulations. RBC Dain professionals engage in providing a broad range of financial services and products some of which are offered by affiliated companies. These professionals maintain the necessary licenses required to offer financial products and services including the trading, distribution and sale of investments such as, for example, stocks, bonds, mutual funds, options and insurance and annuity contracts. RBC Dain's professionals are compensated by various means, including commissions or fixed fees, and their compensation may be affected by the overall value of the assets and any margin balances in the accounts which they service.

6. Order Routing Policies And Payment For Order Flow.

RBC Dain has established order routing arrangements with certain exchanges, broker/dealers and/or other market centers (collectively, "market participants") in equity securities and options. These arrangements have been entered into with a view toward the perceived execution quality provided by these market participants, evaluated on the basis of price improvement performance, liquidity enhancement and speed of execution. RBC Dain regularly assesses the execution performance of these market participants on the basis of these three factors. This assessment includes a periodic review of statistics concerning speed of execution, liquidity enhancement and price improvement performance, as well as an evaluation of these factors as they relate to the size of orders routed to these market participants.

All client orders that are subject to these order routing arrangements are sent to market participants that have represented to RBC Dain that they will execute market and marketable limit orders (except large market or marketable limit orders) at prices no worse than the displayed NBBO*. Each of these market participants provides the opportunity for execution of these orders at prices better than the NBBO when the spread between the best bid and best offer price is greater than the minimum variation. Several of these market participants offer RBC Dain automated routing and execution services that offer advantages to smaller client orders in terms of speed and certainty of execution.

RBC Dain receives payment in the form of cash, rebates, or credits against fees and/or research in return for routing client orders in equity and option securities pursuant to these order routing arrangements. Any remuneration that RBC Dain receives for directing orders to any market participant reduces the Firm's execution costs and will not accrue to my account. RBC Dain may also benefit from these order routing arrangements by receiving favorable adjustments of trade errors from these market participants.



Carrie Devorah [REDACTED]

RE: follow up - RBC/ BGFS

1 message

Suh, Kevin [REDACTED]

To: Carrie Devorah [REDACTED]

Fri, Sep 5, 2014 at 11:42 AM

Ms. Devorah,

Your allegations against RBC and Ms. Bennett were reviewed under STAR # [REDACTED] and [REDACTED] respectively. Both exams have been closed without action. Should you have any questions/concerns, please feel free to contact me.

Regards,

Kevin Suh

213-613-2632

From: Carrie Devorah [mailto:[REDACTED]]
Sent: Wednesday, September 03, 2014 8:34 AM
To: Suh, Kevin
Subject: follow up - RBC/ BGFS

Kevin, hi

Hoping all is well. You were to get back to me on

- 1- the status of your investigation in to RBC
- 2- the status of the original business card I was given by BGFS in 2009 that did not have WIS on its back. The card back is clear.

Please update me.

Sincerely

CARRIE Devorah
[REDACTED]



News Release

For Release: Thursday, March 5, 2009
Contact(s): Nancy Condon (202) 728-8379
Herb Perone (202) 728-8464



FINRA Announces Creation of "Office of the Whistleblower"

Dedicated Team to Handle High-Risk Tips

Washington, DC — The Financial Industry Regulatory Authority (FINRA) announced today that it has established a new Office of the Whistleblower to expedite the review of high-risk tips by FINRA senior staff and ensure a rapid response for tips believed to have merit.

"One of the important lessons learned from the recent scandals is the need for regulators to recognize and react to regulatory intelligence offered by whistleblowers," said Stephen Luparello, FINRA's Interim CEO.

"We want to encourage individuals with evidence of, or material information about, potentially illegal or unethical activity to come forward. This new initiative will ensure that individuals with significant information will reach senior staff, who can quickly assess the level of risk involved and make sure that each tip is properly evaluated. Those tips warranting additional review and investigation will be subject to an expedited regulatory response."

To facilitate the submission of whistleblower information, FINRA's new Office of the Whistleblower has established a toll free phone number — 1-866-96-FINRA (1-866-963-4672) — and has posted a dedicated web page — www.finra.org/whistleblower, where individuals may email their information to FINRA.

Any whistleblower tips that fall outside FINRA's jurisdictional reach will be referred to the appropriate regulatory or law enforcement agencies.

The new office will be overseen by FINRA Senior Vice President Cameron Funkhouser.

FINRA's new whistleblower initiative will not replace the agency's longstanding processes for handling thousands of routine regulatory tips and customer complaints each year. FINRA typically receives between 4,500 and 6,000 formal investor complaints annually, which are vetted by FINRA's Front End Cause Unit. Complaints that appear to have merit are forwarded to the appropriate FINRA District Office or Department - such as Enforcement, Member Regulation or Market Regulation - for further investigation.

Some of FINRA's most significant enforcement actions have resulted from investor complaints or anonymous or insider tips. They include FINRA's 2007 action against Citigroup Global Markets, ordering the firm to pay a \$3 million fine and \$12.2 million in restitution to customers to settle charges of misleading Bell South employees in North and South Carolina at early retirement seminars; FINRA's 2006 fine of \$5 million against Merrill Lynch to resolve charges related to supervisory violations at its customer Call Center; FINRA's 2005 landmark action against the Kansas firm Waddell & Reed, Inc., in which the firm was fined \$5 million and ordered to pay \$11 million in restitution to customers to resolve charges related to variable annuity switching; and, FINRA's 2002 action against Credit Suisse First Boston to resolve charges of siphoning tens of millions of dollars of customers' profits in exchange for "hot" IPO shares, which resulted in a \$50 million fine imposed by FINRA and an additional \$50 million fine imposed by the Securities and Exchange Commission.

Investors can obtain more information about, and the disciplinary record of, any FINRA-registered broker or brokerage firm by using FINRA's BrokerCheck. FINRA makes BrokerCheck available at no charge. In 2008, members of the public used this service to conduct 11.6 million reviews of broker or firm records. Investors can access BrokerCheck at www.finra.org/brokercheck or by calling (800) 289-9999.

FINRA, the Financial Industry Regulatory Authority, is the largest independent regulator for all securities firms doing business in the United States. FINRA is dedicated to investor protection and market integrity through comprehensive regulation. FINRA touches virtually every aspect of the securities business - from registering and educating all industry participants to examining securities firms; writing and enforcing rules and the federal securities laws; informing and educating the investing public; providing trade reporting and other industry utilities; and administering the largest dispute resolution forum for investors and firms.

For more information, please visit our Web site at www.finra.org.

[Sitemap](#) [Privacy](#) [Legal](#)

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Carrie Devorah [redacted]

RE: follow up - RBC/ BGFS

1 message

Suh, Kevin [redacted]
To: Carrie Devorah [redacted]

Fri, Sep 5, 2014 at 12:38 PM

Ms. Devorah,

STAR is our database system. I was simply giving you the exam numbers under which your allegations were reviewed.

no. Banned until 4/5/2010. FINRA is self reported re Voted

Our records indicate that WIS became registered with NASD (n/k/a FINRA) and SEC in November 1995 and in DC in July 2000. Ms. Bennett was registered with Royal Alliance until October 2009 at which time she became registered with WIS. Moreover, BGFS was an investment adviser and not under FINRA jurisdiction. To the extent Ms. Bennett gave you incorrect business cards during this time of transition, we will not be pursuing an enforcement action.

Bennett is an Investment Adviser not under FI jurisdiction. in the meantime Finra knows what to do

Finally, the individual who you claimed to have hacked into your account was one of the architect of RBC's IT system hence his name appears as a creator of the files you received from RBC.

does pay no business league membership

We consider your case to be closed at this time unless new and relevant facts come to light. Thank you for your patience.

done

Regards,

Kevin Suh

From: Carrie Devorah [mailto:[redacted]]
Sent: Friday, September 05, 2014 8:50 AM
To: Suh, Kevin
Subject: Re: follow up - RBC/ BGFS

I am contacting you, Kevin

1- what is Star

2- Dawn Bennett gave me 7 business cards without WIS on its back in 2009, with Royal Alliance Associates on all card fronts, months after 7/29/2009 the date Dawn Bennett was under contract with Western International Securities. WIS was not licensed in DC until 4-5-2010 and you are saying there is no wrong doing?

3- RBC knew for ten years my accounts were being hacked by an individual at another firm, never told me, until two years after the 1st matter was



Carrie Devorah [REDACTED]

RE: Adress request

1 message

IARDLIVE <IARDLIVE@sec.gov>
To: Carrie Devorah <[REDACTED]>

Tue, Aug 6, 2013 at 1:30 PM

Hello Carrie,

Information about the SEC's Office of the Whistleblower may be found at <http://www.sec.gov/about/offices/owb/owb-about.shtml> . Please contact them with any questions you may have. Thank you.

U.S. Securities and Exchange Commission

Division of Investment Management, Investment Adviser Regulation Office

100 F Street, N.E.

Washington, DC 20549-8549

Phone | 202.551.6999



www.SEC.gov

Guidance provided by staff via the telephone or email is informal and is not binding on the staff or the Commission. When submitting tips, complaints, questions, or other information to the SEC, please read the Privacy Act Statement located at: www.sec.gov/privacy.htm

From: Carrie Devorah [mailto:[REDACTED]]
Sent: Sunday, July 28, 2013 3:06 PM
To: Kanyan, Keith
Subject: Adress request

Keith

Hope you are well. What is the correct adress/office for the SEC Whistleblower Award for data to be sent to.

Thanks
Carrie

Contact Bill Singer: ☎917-520-2836 ✉rrbdlawyer@gmail.com
(<mailto:rrbdlawyer@gmail.com>)

f (<http://facebook.com/brokeandbroker>)
t (<http://twitter.com/brokeandbroker>)
g+ (<https://plus.google.com/105473943180031336590/>)
in (<http://www.linkedin.com/in/brokeandbroker>)

BROKE AND BROKER

(<http://www.brokeandbroker.com/index.php>)

An Irreverent Wall Street
by Bill S

DON'T KEEP YOUR AUDIENCE
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speed of your server to the

Public Customers Hit With Attorneys Fees In Arbitration (<http://www.brokeandbroker.com/2313/finra-arbitration-attorneys-fees/>) ← me

📅 February 10, 2014

If you're gonna file a lawsuit, you're gonna need evidence -- and, sometimes, even that isn't enough. In a recent FINRA arbitration, the panel of arbitrators chided a public customer claimant for failing to present *credible* evidence. On top of that, the claimant was forced to cough up the respondents' legal fees.

In a Financial Industry Regulatory Authority ("FINRA") Arbitration *Statement of Claim* filed in November 2013, Claimants alleged, among other causes of action, fraud and breaches of fiduciary duty and contract. The allegations arose in connection with alleged account discrepancies and purportedly unauthorized trades. Initially, Claimant sought \$350,000 in compensatory damages, punitive damages, and \$7,500 in costs and fees. By the close of the hearing, however, the claim for compensatory damages were reduced to \$28,000. In the Matter of the FINRA Arbitration Between Carrie Devorah IRA, Carrie Devorah Living Trust, and Carrie Devorah, Claimants, versus Western International Securities, Inc., Dawn Bennett, and Bennett Group Financial Services, L.L.C. Respondents (FINRA Arbitration 12-03894, January 30, 2014).

Respondents generally denied the allegations and asserted various affirmative defenses.

During the final hearing, the Panel denied Claimants' *Motion for a Directed Verdict* but at the conclusion of Claimants' case-in-chief, the Panel granted Respondents' *Motion to Dismiss* based upon a finding that:

Claimants failed to present credible evidence with respect to any theory advanced in their Statement of Claim and brief. . . MD 8:17-cr-0472-PX

Not merely content to wag a finger at Claimants, the Panel ordered them to pay \$35,000 in attorneys' fees to Respondents. In explaining the rationale for such an award, the Panel explained:

The Panel relied on common law to the effect that when both parties request an award of attorneys' fees in their pleadings, the arbitrators have the authority to grant them to either party. Respondent made an *ore tenus* motion for attorneys' fees. Claimants and Respondents agreed that the Panel had the authority to award attorneys' fees in this case. The crux of the cases on this issue is that the party against whom a ruling is made brought (or defended) the action or maintained it in bad faith, or without a justifiable basis.

In the FINRA Dispute Resolution Arbitrator's Guide *Attorneys' Fees* section is this guidance:

The authority for granting attorneys' fees must be included in the award. If the arbitrators have doubts regarding their authority to award such fees, they should request the parties to brief the issue. There are three situations when parties may pursue attorneys' fees:

- ◆ a contract includes a clause that provides for the fees;
- ◆ the fees are allowed as part of a statutory claim; or
- ◆ all of the parties request or agree to such fees.

Arbitrators must award reasonable attorneys' fees to claimants who prevail under certain statutes, including Title VII actions for discrimination based on race, color, religion, sex or national origin. If the panel determines that a party has a right to reimbursement for attorneys' fees, that party must prove the amount to the satisfaction of the panel.

Prevailing Respondents' Counsel was David E. Robbins, Esq (<http://www.kaufmanngildin.com/Attorneys/David-E-Robbins.shtml>), Kaufmann Gildin & Robbins LLP, New York, NY.

Bill Singer's Comment

A short-and-sweet *Decision* that presents us with the rationale for this Panel's sanctions against Claimants -- compliments to this FINRA panel of arbitrators!

We see the impatience of the arbitrators with a Claimants' case that failed to present credible evidence about *at theory*. That's as harsh a condemnation as is apt to issue forth from a FINRA Arbitration Panel. One can almost smell the fumes from this fuming group of arbitrators. It's as if they are uttering a "really?" followed by "are you serious?" followed by "are you kidding us?" followed by "gee, thanks for wasting our time."

Should the Claimants pursue an appeal to the courts, it will be interesting to see whether the award of lawyers'

stands. When one sees a reference to "common law," that's a sign that lawyers aren't exactly standing on firm ground -- there's no actual law, rule, or regulations that we can cite in support of our position but, hey, you know, for generations and centuries there's the *common law* where we think, we believe, we urge, we strongly suggest that what we're asking for is okay, usually, normally, sort of.

Sensing the need to justify their award of attorneys' fee to the Respondents, the Panel goes to some pains to not common law principle that *when both parties request an award of attorneys' fees in their pleadings, the arbitrators have the authority to grant them to either party*. That's normally a fairly sound proposition but not that always stands up on appeal. Thankfully, Respondents' legal counsel specifically asked on the record for an award of attorneys' fees -- that extra fillip by a veteran lawyer may ultimately save the day. The other bit of weight that may tip the balances in Respondent's favor is the Panel's clear-cut rationale for making the award of attorneys' fees: the Claimant brought the action or maintained it in **bad faith**, or **without a justifiable basis**.

Also READ:

- Frivolous Customer Claims Fall To Eligibility Rule (<http://www.brokeandbroker.com/index.php?a=blogid=2165/finra-eligibility-frivolous/&print=1>)
- Penson and Merrill Lynch Suffer Setbacks With Attorneys' Fees in FINRA Arbitrations (<http://www.brokeandbroker.com/1021/penon-merrill-finra-arbitration-attorneys-fees/>)
- Raymond James Wins Attorneys' Fees In Florida FINRA Arbitration To Recover On Employee Promissory Notes (<http://www.brokeandbroker.com/1153/raymond-james-finra-promissory-note-arbitration/>)

- ◆ Attorneys Fees (<http://www.brokeandbroker.com/index.php?a=topic&topic=attorneys-fees>)
- ◆ Fees (<http://www.brokeandbroker.com/index.php?a=topic&topic=fees>)
- ◆ FINRA (<http://www.brokeandbroker.com/index.php?a=topic&topic=finra>)
- ◆ Arbitration (<http://www.brokeandbroker.com/index.php?a=topic&topic=arbitration>)
- ◆ Evidence (<http://www.brokeandbroker.com/index.php?a=topic&topic=evidence>)
- ◆ BrokeAndBroker (<http://www.brokeandbroker.com/index.php?a=topic&topic=brokeandbroker>)
- ◆ Bill Singer (<http://www.brokeandbroker.com/index.php?a=topic&topic=bill-singer>)



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Customer Agreement For Introduced Clearance Accounts

THIS DOCUMENT IS A BINDING CONTRACT AND CONTAINS OBLIGATIONS THAT CAN BE ENFORCED AGAINST YOU. PLEASE READ CAREFULLY.

JP Morgan's handling of clearing contracts - its clients sign. Neither the BD nor HA are involved

- Complete all sections, sign and return.

Account Number(s)
[Redacted]

Account Title
Carrie Devorah Living Trust, Carrie Devorah TTEE, U/A DTD 12/11/1992

Your brokerage firm ("Brokerage Firm"), acting on your behalf, introduces your account(s) to J.P. Morgan Clearing Corp. ("Clearing Agent"), a subsidiary of J.P. Morgan Securities Inc., which, in turn, carries your account(s) and clears (i.e., processes) your securities transactions as your Brokerage Firm directs. This agreement ("Agreement") sets forth the terms and conditions on which Clearing Agent and J.P. Morgan Securities Inc., its successor firms, present and future direct or indirect subsidiaries, affiliates and assigns will open and maintain account(s) ("Account(s)") in your name.

The parties to this Agreement shall consist of you and J.P. Morgan Securities Inc., its successor firms, present and future direct or indirect subsidiaries, affiliates and assigns with which you transact business. (Each affiliate is referred to as a "Clearing Agent entity" and all Clearing Agent entities together with J.P. Morgan Securities Inc. are referred to collectively as the "Clearing Agent Group" or "JP Morgan.") You agree that your Brokerage Firm and its employees are third-party beneficiaries of this Agreement, and that the terms and conditions hereof, including the arbitration provision, shall be applicable to all matters between or among any of you, your Brokerage Firm and its employees and the Clearing Agent Group and its employees. Your signature below confirms that you agree to all terms set forth in this Agreement.

1. NATURE OF SERVICES.

(a) A Clearing Agent entity will execute transactions accepted by it and/or will provide such other clearance, settlement and custody services in connection with carrying your Account(s) at the Clearing Agent Group.

(b) The Clearing Agent Group is acting as a clearing broker-dealer and custodian, and not as (1) an investment adviser under the Investment Advisers Act of 1940, or (2) a "fiduciary" as defined in Section 3(21) of the Employee Retirement Income Security Act of 1974, as amended ("ERISA") or Section 4975 of the Internal Revenue Code of 1986, as amended ("Code"), with respect to your Account(s) under this Agreement. Brokerage activities are regulated under different laws and rules than advisory activities and generally do not give rise to the fiduciary duties that an investment adviser has to its clients. When acting in a brokerage capacity, JP Morgan has a duty to deal fairly with brokerage clients but may face certain conflicts of interest and as such, JP Morgan's interests may differ than yours. Neither the Clearing Agent Group nor its employees are authorized to provide, and shall not provide, legal, tax or accounting advice or services and you will not solicit or rely upon any such advice from them whether in connection with transactions in any of your Accounts or otherwise. You have consulted or will consult with your own technical, legal, regulatory, tax, business, investment, financial and accounting advisors to the extent you deem necessary in determining the investment and trading strategy appropriate for you and the appropriateness of each transaction. You hereby agree and acknowledge that any such advice you may receive is provided by your Brokerage Firm or other source independent of the Clearing Agent Group. For the avoidance of doubt, while your Brokerage Firm may provide you with investment research or market interpretations it has received from the Clearing Agent Group or with access to a Clearing Agent Group web site containing such information, your Brokerage Firm is solely responsible for your use of any such materials and any investment recommendations made therein.

(c) The Clearing Agent Group shall not be obligated to take any action or render any advice with respect to the voting of proxies related to issues

of securities held in your Account(s). Further, there may be instances when you may not be able to exercise voting or other rights of ownership, including, but not limited to, the circumstances described in Section 11 below. The Clearing Agent Group will forward all proxies received by it, including proxy solicitation material and other related material, including interim reports, annual reports and other issuer mailings ("Proxy and Related Material") to you or a third party as you instruct. If you receive Proxy and Related Material regarding investments in your Account(s), you are responsible for providing the Clearing Agent entity with any applicable instructions or directions contemplated by such communications. If you notify the Clearing Agent Group that you have revoked a third party's authority, all Proxy and Related Material will be sent to you on a going forward basis from the date the revocation is effected by the Clearing Agent Group until you notify the Clearing Agent Group to send all Proxy and Related Material to another third party.

(d) You hereby acknowledge receipt of the disclosure statement mailed by the Clearing Agent Group pursuant to Rule 382 of the New York Stock Exchange, Inc. As disclosed in such statement, the Clearing Agent Group is responsible only for certain specific functions related to processing your transactions, carrying your account(s) and extending credit in your margin account(s). If any, your Brokerage Firm is solely and completely responsible for all other functions required of registered securities brokerage firms by Applicable Laws, including, but not limited to, all investment advice and recommendations made to you, including but not limited to the purchase or sale of securities. Your Brokerage Firm is neither an affiliate nor an agent of the Clearing Agent Group.

(e) Your Brokerage Firm is responsible for accepting from you and executing (or arranging for the execution of) orders for your account(s) to buy or sell securities, or to transfer or deliver funds or securities to you or third parties. Accordingly, unless a Clearing Agent entity receives from you prior written notice to the contrary, the Clearing Agent Group may accept and process from your Brokerage Firm, without any inquiry or investigation: (i) orders, which the Clearing Agent Group has agreed to clear, for the purchase or sale of securities and other property in your account(s), on margin or otherwise, or for the delivery of funds to you or third parties, and (ii) any other instructions concerning your account(s) or the property therein (including, without limitation, an instruction to provide your account information to third parties for performance reporting or other purposes). The Clearing Agent Group also has the right, exercisable in its sole discretion, to refuse to accept orders, cancellations or any other instruction for your account(s) and to require you to furnish any additional documentation it deems necessary. You understand and agree that the Clearing Agent Group shall have no responsibility or liability to you for any acts or omissions of your Brokerage Firm, its officers, employees or agents.

1A. INVESTMENT ADVISOR AUTHORIZATIONS.

(a) If you or your Brokerage Firm notifies the Clearing Agent Group that you have granted an investment advisor ("Investment Advisor") trading authorization over your Account(s), you authorize the Clearing Agent Group to follow the trading instructions of that Investment Advisor in every respect concerning the applicable Account(s), including instructions related to purchases, sales or other transactions and instructions with respect to margin. You acknowledge and agree that the Clearing Agent Group may refuse to accept instructions from any Investment Advisor, or any other third party at any time.



Carrie Devorah [redacted]

RE: Procedural questions addressing Accounts Cleared Through JP Morgan

1 message

Feigelman, Barbara [redacted]
To: Carrie Devorah [redacted]
Cc: "Moy, Julie" [redacted]

Thu, Mar 27, 2014 at 9:42 AM

Ms. Devorah:

As discussed today and as indicated previously, you are a client of Western International Securities Inc., a broker dealer firm for which we provide clearance services on a fully disclosed basis.

no contract

Regarding the points you listed in your below email and your similar recent telephone requests, please note the following:

- Regarding the receipt of your account assets from another firm during December 2009 for each of your accounts, these asset transfers can be found as "Received" entries in the Transaction Detail section of your December 2009 statement.
- Regarding trade information, JPMCC provides a monthly clearing statement to all its fully disclosed broker dealer firms. The clearing statement reflects all trades cleared by JPMCC for the Broker Dealer. Among other information, the monthly report includes trade details and commissions / fees charged by the broker dealer.
- Regarding Certificates of Deposit transactions, they are not traded on an exchange, as such, are not time stamped.

not present at the JPS

Western International Securities, Inc., is responsible for the overall conduct of your account which includes the responsibility of reviewing and responding to complaints and inquiries regarding your account. Please be advised that J.P. Morgan Clearing Corp. will provide no further information or documentation regarding these matters.

↑ I heard that dot :)

Barbara Feigelman | Vice President | Investment Bank | Client Services | **J.P. Morgan** | 3 Chase Metrotech Center, NY1-H051, Brooklyn, NY 11245 | T: 347 643 2575 | F: 973 463 5300 | barbara.feigelman@jpmorgan.com | jpmorgan.com

From: Carrie Devorah [mailto:[redacted]]
Sent: Wednesday, March 26, 2014 9:46 AM
To: Feigelman, Barbara; Suh, Kevin
Subject: Fwd: Procedural questions adressing Accounts Cleared Through JP Morgan

Ms. Feigelman

I have two questions I want answered today if you will:

1- does JP Morgan time stamp, to the hour/minute/second new accounts being cleared in? If JP Morgan has another process by which the accounts exact moment of arrival is, please advise.

2- what is JP Morgan's process for providing numbers, ie. a total of an accounts commissions and/or fees to a Firm client, for the purpose of use in a legal proceeding of any kind or in response to a written query

(i) does JP Morgan create charts that are sent to the person requesting

(ii) does JP Morgan send the charts/calculations of on paperwork

(iii) is that paperwork stamped/identified as from JP Morgan

(iv) is that paperwork not stamped/identified as from JP Morgan

(v) are there specific guidances to the person making a request for a history of commissions/fees on how that information can be used

Because of the pushback in our call, I am cc'ing this email to FINRA. I want these general procedural questions answered today. The call fielded by Ms Julia Moy, has not been responded to. The email to Nick Davis was not responded to.

Sincerely

CARRIE Devorah



This email is confidential and subject to important disclaimers and conditions including on offers for the purchase or sale of securities, accuracy and completeness of information, viruses, confidentiality, legal privilege, and legal entity disclaimers, available at <http://www.jpmorgan.com/pages/disclosures/email>.



Carrie Devorah [REDACTED]

In Response To Your Mail Fraud Report C#16 [REDACTED]

1 message

CISFCSEexternal@uspis.gov <CISFCSEexternal@uspis.gov>

Fri, Mar 28, 2014 at 12:32 PM

To: [REDACTED]

Thank you for contacting the U.S. Postal Inspection Service. The information you provided has been entered into our national Fraud Complaint System. Your reference number is C#16 [REDACTED]. If we need more information, you will be contacted directly. Please hold on to any original documents related to your complaint.

Please note that Postal Inspectors do not have the authority to ensure that your losses are refunded.

We may share the information you provided with other agencies when there is a possible violation within their jurisdiction.

In the future, if you have complaints about mail fraud or mail theft, you can visit our website, <http://postalinspectors.uspis.gov>, to file a complaint online.

United States Postal Inspection Service

This is a system-generated email message. Please do not reply to this message.



Carrie Devorah [REDACTED]

RE: Addressing BGFS and Dawn Bennett- FINRA Audio

1 message

Ringle, Judith A [REDACTED]
To: Carrie Devorah [REDACTED] <owbcorrespondence@sec.gov> <owbcorrespondence@sec.gov>

Tue, May 27, 2014 at 9:58 AM

Dear Ms. Devorah:

I apologize for not getting back to you sooner. I meant to respond to your correspondence of May 12 (attached). From what you have disclosed to CFTC OIG, it appears that the SEC Office of Whistleblower may be the appropriate contact. CFTC OIG is charged with responsibility for identifying and making recommendations regarding the alleviation of fraud, waste and abuse in the programs and operations of the CFTC. Essentially we receive allegations of improper conduct by the Agency and its employees. I meant to tell you that.

But CFTC also has a whistleblower program. You can get more information about them here -- <http://www.cftc.gov/ConsumerProtection/WhistleblowerProgram/index.htm> -- and they can be reached at whistleblower@cftc.gov and by phone at (866)873-5675. Complaints regarding misconduct by market professionals who are regulated by CFTC should be made to the CFTC's Division of Enforcement (enforcement@cftc.gov or (866)366-2382) or the whistleblower program.

Sincerely,

Judy Ringle, Attorney-Advisor

CFTC OIG

From: Carrie Devorah [mailto:[REDACTED]]
Sent: Tuesday, May 27, 2014 1:42 AM
To: Ringle, Judith A; owbcorrespondence@sec.gov
Subject: Addressing BGFS and Dawn Bennett- FINRA Audio

It occurred to me you might want

the FINRA audio recording

- 1- Dawn Bennett's testimony and that of Brad Mascho too
- 2- it does contain my testimony
- 3- it does contain the Hot Mic moment with the Panel

The file was sent by email from FINRA. If you have drop box, I can send it to you. It is important to recall any and all testimony re RBC/Scott Sangerman

is moot in that the Encrypted CD sent, as you are aware, by RBC's attorney Carolyn Guy in 2012, showed there was fraud known to RBC they failed to advise me about but impacted on the paperwork presented during the WIS/BGFS/Bennett arbitration. Any and all data on the Encrypted CD is worthless in that my RBC accounts were, and to this day since the accounts are opened but unfunded, were/are being manipulated by a JP Morgan employee Bryan Gasche. I did my best to answer the RBC matter was under review by the USPS Mail Fraud, IRS, and SEC. But as the Panel said in their hot mic moment, I was the unbelievable person.

FYI, I located yet another matter with Bennett she failed to advise about. She was designing in other business matters prior to my being her client. I am sending along the documents I located. The statement of claim confirms it is "our" Dawn Bennett.

Please advise what you want to do re the FINRA audio. Judy, the SEC will take lead. I will send it to them, they will provide it to you.


Sincerely

CARRIE Devorah



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 **Re_ Your recent letter (received May 1, 2014).pdf**
594K



Carrie Devorah [redacted]

Re: Notice from the U.S. Commodity Futures Trading Commission -wb-


1 message

Carrie Devorah [redacted]
To: Whistleblower <Whistleblower@cftc.gov>

Thu, Jun 19, 2014 at 11:32 AM

I received this today. This form has been sent in, filed in, notarized already. You have received a few mailings from me, all Certified Return Receipt Requested. You have the Form ICR completed
Carrie Devorah
(submission 2014-06-09)

On Wed, Jun 11, 2014 at 9:16 AM, Whistleblower <Whistleblower@cftc.gov> wrote:



This is a secure message.
To read it, open the attachment.

[More Info](#)

Disclaimer: This email and its content are confidential and intended solely for the use of the addressee. Please notify the sender if you have received this email in error or simply delete it.

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Sincerely
CARRIE Devorah
[redacted]

Founder
THE CENTER FOR COPYRIGHT INTEGRITY
www.centerforcopyrightintegrity.com @godingovt
Where ARTS, IP, ID, IT and ENFORCEMENT Come Together In One Voice Against Online Theft Of Content and Commerce

CCIA : Profiler : trained MPI : LACBA-DRS : CA-BSIS Actively built the 1st discrete site crime analysis lab on a campus in North America

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 2014 6 19 CFTC06192014.pdf
3925K



Carrie Devorah [redacted]

RE: Follow Up With Notes/Files To Meeting- FINRA

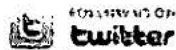
1 message

Wayman, Carol [redacted]
To: Carrie Devorah [redacted]

Thu, Aug 7, 2014 at 9:36 AM

Thanks

Carol Wayman
Acting Legislative Director
Congressman Keith Ellison (MN-05)
2244 Rayburn House Office Building
Washington, DC 20515
202.225.4755



From: Carrie Devorah [mailto:[redacted]]
Sent: Wednesday, August 06, 2014 1:21 AM
To: Wayman, Carol; Truding, Bradley; Bradley, Katelynn
Subject: Follow Up With Notes/Files To Meeting- FINRA

Dear Carol, Kristofor, Katelynn, Bradley and Darrell,

I took some time to expand on the initial zipped file I sent, locating and organizing data that will facilitate you. (1) An overview letter addressing the iniquity of Loss of Civil Liberties to people stealing to put food on their table in contrast to Wall Street thieves allowed to keep alot of the funds they stole and benefitting from Expungement cleansing their backgrounds, letting them enjoy civil liberties and continue robbing new unsuspecting victims unaware of covered up crimes (2) and folders of data I glossed over while we spoke.

FINRA INFO T.zip

I know where/how to locate the info or have recall of what I looked at or documents I have from the situations I was/am party to.

2- FOLDER (Recommended Order To Open In)

- (i) 2014 8 5 ZIP FILE OF EARLIER EMAILED DOCUMENTS PRESENTED TO STAFFERS
- (ii) 2014 8 5 THE ATTACHMENTS TO ACCOMPANY THE OVERVIEW LETTER
- (iii) Laws Potentially Broken
- (iv) FINRA Official DEVORAH Arbitration record digital HOT MIC Files 154-160
- (v) FINRA GUIDE TO INVESTORS What To Do When Problems Arise
- (vi) FINRA ARBITRATORS GUIDE (88 pages)
- (vii) 2012- FINRA Inc. Form 990
- (viii) 2012-FINRA DRS Form 990
- (ix) 2012-FINRA INVESTOR EDUCATION FUND
- (x) 2012-FINRA Regulation Inc Form 990
- (xi) FINRA Maryland Department Of Corporations filings showing FINRA Members have stock
- (xii) PIABA Form 990
- (xiii) 2009-10-6 RBC USA President John Taft Written Testimon (listen to the Audio for Q&A

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Sincerely

CARRIE Devorah



Founder
THE CENTER FOR COPYRIGHT INTEGRITY

www.centerforcopyrightintegrity.com @godingovt

Where ARTS, IP, ID, IT and ENFORCEMENT Come Together In One Voice Against Online Theft Of Content and Commerce

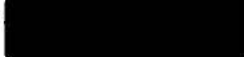
CCIA : Profiler : trained MPI : LACBA-DRS : CA-BSIS Actively built the 1st discrete site crime analysis lab on a campus in North America

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Carrie Devorah



Follow up to call & links in advance of Monday meeting

1 message

Carrie Devorah <[redacted]>
To: "Truding, Bradley" <[redacted]>

*Composman
Eleanor Adams John*

Fri, Aug 1, 2014 at 11:59 AM

Dear Bradley

Thank you for taking time for my call. I look forward to our meeting Monday at 2:00.

Here are my comments filed with the SEC and FINRA I said I would send along. The links are on my site landing page www.centerforcopyrightintegrity.com

COMMENT: FINRA Rule 2210 - HYPERLINKING INDUSTRY WEBSITES TO FINRA BROKERCHECK

THE SEC CROWDFUNDING MANIFESTO..... MORE

COMMENT: FINRA Rule 2210 - HYPERLINKING INDUSTRY WEBSITES TO FINRA BROKERCHECK

-
Sincerely
CARRIE Devorah



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www.centerforcopyrightintegrity.com @godingovt
Where ARTS, IP, ID, IT and ENFORCEMENT Come Together In One Voice Against Online Theft Of Content and Commerce
<https://www.youtube.com/watch?v=l93F73UYmsw&feature=youtu.be>

CCIA : Profiler : trained MPI : LACBA-DRS : CA-BSIS Actively built the 1st discrete site crime analysis lab on a campus in North America
COFFEE @ CLOCKERS "A Sense Of Place"
<https://www.youtube.com/watch?v=kvEVS-GIXrU>

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Carrie Devorah <[redacted]>

RE: touching base/ question

1 message

Kanyan, Keith [redacted]
To: Carrie Devorah [redacted]

Wed, Sep 3, 2014 at 3:09 PM

Hello Carrie,

You will have to ask the SEC's Office of Acquisitions or SEC's FOIA office for any information or copies of contracts. See <http://www.sec.gov/oacq> for information about making a request.

KEITH KANYAN

Program Specialist

U.S. Securities and Exchange Commission

Division of Investment Management

100 F Street, N.E.

Washington, DC 20549-8549

Phone | 202.551.6737

Room 8648



www.SEC.gov

Guidance provided by staff via the telephone or email is informal and is not binding on the staff or the Commission. When submitting tips, complaints, questions, or other information to the SEC, please read the Privacy Act Statement located at: www.sec.gov/privacy.htm

From: Carrie Devorah [mailto:[redacted]]

Sent: Wednesday, September 03, 2014 11:32 AM

To: Kanyan, Keith

Subject: touching base/ question

Hi Keith

Hoping all is well.

I heard the SEC has a contract with FINRA. I want to see that contract. How can I see it? Can I find it online?

Sincerely



Carrie Devorah [redacted]

Recall: Form ADV

1 message

Martin, Lucinda (DISB) <[redacted]> Mon, Sep 8, 2014 at 3:04 PM
 To: "Alula, Claudine (DISB)" <[redacted]>, "Carrie Devorah" <[redacted]>
 Cc: "Miles, Theodore (DISB)" <[redacted]>, "Goff, Maurice (DISB)" <[redacted]>, "Kunzweiler, Brad (DISB)" <[redacted]>
 "Reed, Dena C. (DISB)" <[redacted]>, "Meaza, Senayet (DISB)" <[redacted]>

Martin, Lucinda (DISB) would like to recall the message, "Form ADV".

Give your kids a smart start. Come to the MLK Library for the STAR Family Festival on Sept. 13 at 11 a.m. and see how easy and fun early learning can be. For more information, visit <<http://dclibrary.org/starfestival>>



Carrie Devorah <[redacted]>

RE: FINRA arbitration - letter to Task Force

1 message

Rushkoff, Bennett (OAG) <[redacted]>
To: Carrie Devorah <[redacted]>

Mon, Mar 9, 2015 at 4:34 PM

Copy of letter is attached.

NINE GROUPS URGE FINRA TASK FORCE TO RELEASE DATA ON MANDATORY ARBITRATION FOR INVESTORS

WASHINGTON, D.C. – January 21, 2015 – Nine groups today urged the FINRA Dispute Resolution Task Force to improve the transparency of mandatory arbitration for investors by releasing a wide range of data not now publicly available. The joint letter is available online at <http://www.piaba.org>.

The groups included Americans for Financial Reform, the Alliance for Justice, the Center for Justice and Democracy, Consumers Union, National Consumers League, Public Citizen, the National Association of Consumer Advocates, US PIRG, and the Public Investors Arbitration Bar Association (PIABA).

The letter from the nine groups arrives one day before the FINRA Dispute Resolution Task Force is to meet in Washington, D.C.

In their joint letter, the groups wrote: "... we request that you support the release of information, including data in the form of studies and reports, that FINRA and/or the SEC have collected regarding investor awareness and understanding of predispute binding mandatory (or forced) arbitration; effectiveness of FINRA's arbitrator selection process; prevalence of forced arbitration clauses in brokerage firm and investment advisory contracts; and other feedback that FINRA has collected from investors about any or all of these issues."

The letter notes: "Mandatory arbitration deprives investors doing business with brokerage firms and investment advisers of the right to a judge and jury. Investors do not receive open hearings and often do not receive fair ones. In addition, the process is unlikely to result in adequate awards against brokers to deter misconduct and compensate injured investors. There is even evidence that brokers have been able to use the arbitration process to clean their records of investor complaints, as if they never occurred. Although it is intended as a substitute for public

courts, FINRA's arbitration system stunts development of critical legal policy. It also can deprive investors of the benefits of the law because arbitrators are not obligated to follow it, and written opinions are closed to the public or may not be issued at all. Meanwhile, important information about arbitrator selection and other elements of FINRA's arbitration system remain unavailable to the public."

The letter points out: "The Public Investor Arbitration Bar Association (PIABA), an organization of lawyers who primarily represent investors, has, during the last year, released a series of studies examining some of the structural and procedural traits of FINRA arbitration. The published data in PIABA's reports indicates that FINRA arbitration proceedings foster secrecy of information that should be available to investors and that aspects of the system suggest partiality towards industry participants ... the studies found that most stockbrokers' requests to remove investor complaints from their public record are granted, resulting in the omission of critical information from FINRA BrokerCheck system; that the BrokerCheck system also omits other critical information concerning prior conduct of stockbrokers and broker-dealer firms that investors need to make informed decisions; and that FINRA's arbitrator selection process is not only secretive but it results in an arbitration roster that lacks diversity."


Recently, PIABA went to court to compel the Securities and Exchange Commission (SEC) to release certain arbitration data under the Freedom of Information Act, but the request was denied.

In its conclusion, the joint letter outlines specific steps that FINRA can take to facilitate meaningful disclosure:

"We urge FINRA to encourage transparency and to facilitate the release of data and information as described below.

- We request that FINRA support the release of information, including data in the form of studies and reports, that FINRA and/or the SEC have collected regarding investor awareness and understanding of predispute binding mandatory (or forced) arbitration; data to support stated goals of FINRA's arbitrator selection process; the prevalence of forced arbitration clauses in brokerage firm contracts; and other feedback that FINRA has collected from investors about any or all of these issues.
- We request the FINRA support release of any data from investigations regarding arbitration awards, in particular any data allowing comparison of cases where investors are awarded a fraction of their losses to those where investors are fully compensated for their losses.
- We request that FINRA support release of any data or analysis by the SEC or FINRA concerning arbitrators' records, including any analysis of the percentage of cases in which individual arbitrators have found in favor of a brokerage firm over an investor or vice versa.
- We request that FINRA support release of any SEC or FINRA analysis of data on the likelihood of an investor prevailing on any particular type of claim or the likelihood of any

particular arbitrator issuing an award in favor of an investor or a brokerage firm.

 We request that FINRA support release of any data or information addressing whether investor protection is less secure in the investment advisory context where the choice of arbitration providers is solely within the discretion of the investment advisers or in FINRA arbitration, the required forum for brokerage firms.”

MEDIA CONTACT: Will Harwood, (703) 276-3255 or wharwood@hastingsgroup.com; and

Christine Hines, (202) 454-5135 or chines@citizen.org.

 **Letter to FINRA Arbitration Task Force (January 21, 2015).pdf**
458K



Carrie Devorah

Follow up to conversation with Deborah Breneani

1 message

Carrie Devorah
To: whistleblower@cftc.gov

Tue Mar 24, 2015 at 11:34 PM

Deborah

I filed out the online form.

After I completed the TRC form, I was asked for a name and password, not before. I did look to see if I could locate where to fill out a Password entry. I did not locate it so I printed out the form that I filled in and am sending the printed WB form along to you as one of the attachments.

The details you want are in the filings 1:15-cv-00032 (CRC) and in the papers filed with the OSC, the other two attachments. The Court matter is current in DC.

My Motions filed with the Court are sent to you, in one of the attachments. The other attachment are filed with the OSC.

In that I have quarterbacked, RBC, JP Morgan and FINRA in to the filing with the focus on RBC, I recommend that as you need assistance, call and or arrange for us to meet, in that I a clarity from a POV missed in your filings.

Sincerely
Carrie Devorah

2015 3 24 CFTC WB.pdf

CFTC.zip

RBC DC Court filings SEND TO CFTC.zip

--
Sincerely
CARRIE Devorah

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Keith Ellison Bill HR 2998.pdf
7241K



Carrie Devorah [REDACTED]

Whistleblower Office - Automated Response

1 message

Whistleblower <Whistleblower@cftc.gov>
To: Carrie Devorah [REDACTED]

Tue, Mar 24, 2015 at 11:36 PM

Thank you for contacting the Whistleblower Office of the Commodity Futures Trading Commission. We are eager to hear from and provide assistance to persons who would like to be considered for an award under the whistleblower program. We will respond to your questions as quickly as we can. Please note the following:

- This email address should be used only to ask questions about the whistleblower program. Please do not attempt to send a whistleblower submission by email.

- If you would like to become a whistleblower, please file a Form TCR either electronically, by mail or by facsimile. To file electronically, please click on the "File a Tip or Complaint" button located on the right-hand side of the Commission's home page, www.cftc.gov, and click on the form under the description of the whistleblower program. To file by mail or facsimile, please print a blank Form TCR, complete it, and mail or fax it to the address or number below:

Commodity Futures Trading Commission

Whistleblower Office
1155 21st Street, NW
Washington, DC 20581
Fax: (202) 418-5975

- While the Whistleblower Office can explain the law and rules behind the whistleblower program, we cannot provide you with legal advice or an opinion about your particular whistleblower submission or award claim.

- Please understand that any further inquiry conducted by the Commission as a result of any information you provide is confidential. The fact that the Commission may investigate a firm or person generally will not be disclosed until such time as a public proceeding is brought either before the Commission or in federal court.

- You can learn more about the whistleblower program by visiting the "Whistleblower Program" page of the Commission's website, www.cftc.gov, where you will find the rules for the whistleblower program, frequently asked questions, and filing instructions.

BROKER AGREEMENT
Schedule A

FINRA
supra
such thing as
Broker
Cater (expedited)

Independent Contractor
Agreement.

clients use of
BOTS not BFI

This agreement between Bennett Financial Group ("Broker") and Western International Securities, Inc. ("Western") is dated July 27, 2009. This agreement is to be used in conjunction with the Independent Contractor Agreement (ICA) and is designed to encompass specific payout and expense issues not addressed in that Agreement. Bennett Financial Group will be bound by the terms of the ICA with regard to regulatory requirements and responsibility for errors and losses attributed to her business.

Payout

The payout on all brokerage, management and advisory business (regardless of whose RIA is used) will be 92% based on maintaining two million per year in overall production.

Ticket Charges

All J.P. Morgan (or other clearing broker-dealer) fees will be passed on to Broker for brokerage business. For advisory business the fee can be passed on to the customer. The most common ticket charges by J.P. Morgan are as follows:

- Stocks \$15.95 per ticket.
- Bonds \$19.95 per ticket
- Options \$15.95 per ticket plus \$1.50 per contract

Mutual funds are no charge if done directly with the fund or within a JP Morgan Fund Circuit account. Funds done over the wire will be charged \$11 per ticket, \$7.50 for mutual fund exchanges. The vast majority of our listed business is executed third market and that is the default for MORCOM Order Entry System. If you direct a trade to a listed exchange or get special handling from a JP Morgan trading desk, there may be additional execution fees. There may also be per share fees to execute on certain algorithm trading systems. Customers will pay a \$4.75 service fee.

Registration and fees

- Western will pay for the cost to transfer Bennett Financial Group series 7 and up to four state license fees. Bennett Financial Group will be responsible for all renewal fees. Western adds a \$15 per state processing fee to each state registration. Bennett Financial Group will also be responsible for Western's annual association fee beginning in summer 2010. The association fee covers the firm's Fidelity bond and the cost of registration in all of the states and runs approximately \$490 per year.
- Errors and omissions insurance is obtained by Western, and is mandatory for all independent contractors who hold a series 6 or 7 regardless of production. The amount will be determined annually based on the premium and is currently

000000725

\$2,299.62 per year and our policy renews in March, Bennett Financial Group will pay a prorated portion monthly until renewal.

- Any further expenses of operating your office will be billed to and paid by you. Western will offer JP Morgan access for \$60 a terminal. Western will provide a mandatory NASD/SEC compliant email address and instant messenger service for \$25 a month per address. There may be additional charges to use a custom domain.

There is an annual office compliance inspection and it will be provided by Western at a cost of \$595.

Western will charge back all fees versus Bennett Financial's monthly production. If the production does not cover the fees, Western will allow Bennett Financial to carry a debit. If the debit exceeds \$1000, the entire amount must become current in 45 days.

Transition Support

Western will provide transition support money based on the following schedule:

- \$125k upon receiving the first 100 ACAT forms
- \$100k ninety days after arrival (to be paid by JP Morgan)
- \$25k when \$1.5 million in gdc is reached (must occur within the first 14 months)
- \$150k when \$3 million in gdc is reached (must occur within the first 14 months)
- \$25k when \$4 million in gdc is reached (must occur within the first 14 months)
- \$25k when \$5 million in gdc is reached (must occur within the first 14 months)
- \$25k when \$6 million in gdc is reached (must occur within the first 14 months)
- \$25k when \$7 million in gdc is reached (must occur within the first 14 months)

This money will be the only contribution Western will make to cover transition expenses, including but not limited to: ACAT fees, repapering, postage, IRA termination, and check writing fees.

Media

To the extent compliant with rules and regulations of FINRA, the SEC and other applicable regulatory authorities, Broker may make personal and promotional appearances without pre-approving content, including but not limited to television and radio appearances, print interviews, internet commentary and web pages. Any advertising will be pre-approved before use and any non-advertising material used later as advertising, i.e., TV appearances and print interviews, which do not meet the compliance standards, will be withdrawn from use immediately upon notice.

Advertising materials and compliance submissions

Evaluation and adjudication of Broker compliance submissions will generally be completed within 24 hours of submission.

International accounts

To the extent compliant with rules and regulations of FINRA, the SEC, other applicable regulatory authorities, and J.P. Morgan (or other clearing firms Western may use in its discretion), Broker will be supported in opening customer accounts and transacting business through offices, partners and affiliates in international locations. Broker intends to market, serve clients and sell product from these offices in compliance with all applicable regulatory authorities. Broker understands that international business may trigger additional compliance oversight by Western or Western's clearing firm, in order to comply with applicable law, including anti-money laundering compliance under the US Patriot Act. Western and its clearing broker reserve the right to close or restrict any accounts as may be deemed necessary in their discretion to comply with applicable law. It is understood that to the degree international expansion increases Western's cost structure (e.g., if the creation of such offices requires extraordinary compliance oversight by Western or its clearing firm) Broker agrees to bear such costs.

Regulatory interaction

Broker reserves the right to appeal to the appropriate regulatory authority in any questions arising from compliance submissions. Broker shall first submit to Western any such communications Broker intends to submit to a regulatory authority.

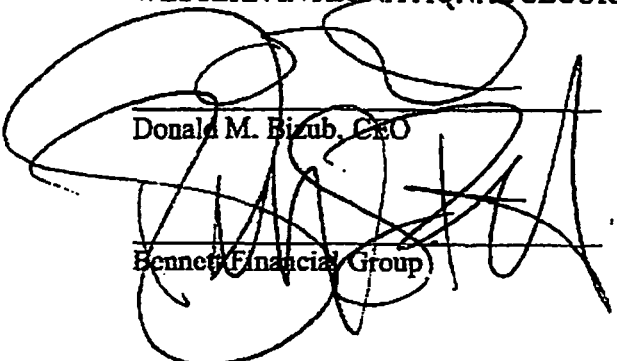
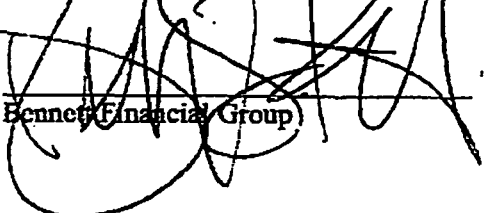
Product development

Broker reserves the right to create investment products that are licensed and sold domestically and internationally by other financial institutions and insurance companies, provided that Broker fully complies with FINRA Rules 3030 and 3040, Western's compliance requirements and other applicable regulatory authority. It is understood that to the degree these product expansions impact the Western's cost structure (e.g., if extraordinary compliance oversight is necessary), Broker agrees to bear such costs.

Other

Western respects a Broker's right to transfer his/her customers if he/she chooses and Western will facilitate a negative transfer with a sixty day notice. Western will not interfere with the transfer of Bennett Financial Group's clients to a new firm and will not solicit them. The terms of your Schedule A are confidential and not to be shared with others.

WESTERN INTERNATIONAL SECURITIES, INC.


Donald M. Bizub, CEO

Bennett Financial Group

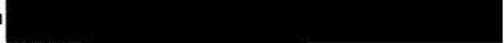
8-6-9
Date

7/27/09
Date



Carrie Devorah **FOIA Request/Tracking # 129/ACKNOWLEDGMENT**

1 message

Alula, Claudine (DISB) To: "Carrie Devorah" Cc: "Reed, Dena C. (DISB)" Mon, Mar 31, 2014 at 4:55 PM 

Good afternoon Ms. Devorah,

This acknowledges your Freedom of Information Act (FOIA) request of March 30, 2014 to the D.C. Department of Insurance, Securities and Banking (DISB) in which you seek:

Lucinda,

Hoping all is well. Thank you for the answer. I am not clear on it to understand it.

Does an advisor need a U4 to represent themselves as an advisor in general and specifically in the District of Columbia? YES. NOTE RE FIRM AS SOLE PROP.

Does a broker(dealer) need a U4 to represent themselves as a broker(dealer) and specifically in the District of Columbia? YES. NOTE RE FIRM AS SOLE PROP.

Did Bennett Group Financial Services have a U4 for 2010 or any other license for it to operate in the District of Columbia? CHECK THIS AGAINST THE INFO IS MS. BENNETT'S LETTER. NOTE IF IT WAS IN A DIFFERENT NAME.

Did Bennett Group Financial Services licenses and specifically in the District of Columbia provide for it, between 2006 - 2013, to operate as

(i) an RIA for Pools, Pensions or AGAIN, PERHAPS DIFFERENT NAMES.

(ii) an RIA for Individuals or AGAIN, PERHAPS DIFFERENT NAMES.

(iii) in insurance for Pools, Pensions or I'M NOT SURE IF THIS -- "INSURANCE FOR POOLS, PENSIONS" -- IS AN ACTUAL CATEGORY. ALSO, IT SEEMS TO BE MORE OF AN INSURANCE CATEGORY THAN A SECURITIES CATEGORY.

(iv) in insurance for Individuals THIS IS AN INSURANCE CATEGORY.

(v) all of the above JUST ANSWER THE SPECIFIC QUESTIONS.

(vi) none of the above JUST ANSWER THE SPECIFIC QUESTIONS.

I laid out the questions allowing you to type your answers, Yes or No, beside the question(s) The answers and documentation, if any, are needed immediately. I WOULD NOT PROVIDE DOCUMENTATION. THAT TURNS IT INTO A FOIA REQUEST

Your request was received by this office on March 31, 2014 and assigned **FOIA Tracking # 129**.

DISB staff is currently reviewing records to determine what, if any, responsive documents exist. DISB will make every effort to meet the 15 business day deadline as required by law to process your request. However, if DISB determines that an adequate search for records will take longer than the 15 business days, DISB may invoke the 10-working day extension. Should DISB need the 10-working day extension, DISB will inform you expeditiously in writing including informing you of the reasons for the extension and the expected date of completion of your request.

The FOIA fee schedule is found in District regulations at DCMR 1-408. Those fees include a research fee (\$10 per occurrence), Review fees (hourly rate based on the number of employees and their hourly salary) and copy fees (\$0.25 per page).

The specific fees for this request would be based on the number of pages of documents copied, plus research and review fees based on the number and salary of each employee involved in responding to the request.

I will of course inform you of any research and review fees and duplication fees, before copies are made. You should expect to pay such fees before receiving copies of any records found in this search. I will keep you informed of timelines and costs. Please do not hesitate to contact me if you have any questions.

Sincerely,

Claudine Alula, MLS

Paralegal Specialist/FOIA Officer

Office of the Attorney General for D.C.

Office of the General Counsel

Department of Insurance, Securities and Banking

810 First Street, NE, Suite 701

Washington, DC 20002

(P) 202-442-7808 / (F) 202-576-8903

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Carrie Devorah [REDACTED]

RE: Follow Up

1 message

Hogue, Cynthia [REDACTED]
To: Carrie Devorah [REDACTED]

Tue, Jun 3, 2014 at 7:50 AM

Ms. Devorah, your issues do not fall within the jurisdiction of the GAO Inspector General. There is nothing that our office can do to assist you regarding your allegations. I provided the physical mailing address for the Social Security Administration OIG, as you requested.

Thank you for contacting the GAO OIG.

Cynthia Hogue

From: Carrie Devorah [mailto:[REDACTED]]
Sent: Monday, June 02, 2014 4:10 PM
To: Hogue, Cynthia
Subject: Fwd: Follow Up

Thank you Cynthia.

I am prepping papers for Patrick. I have a partial set going to the GAO. Let me leave it at what you are getting first.

I must appreciate your taking me at face value. I am stunned by the "experts" who say what took place in the second matter, documented in to audio, never too place. Ok. Then explain the audio. Something is very wrong with alot of the Arbitration that ended in an award against me. There are steps of what can be done to yank the whole matter. It is in plain English if the "experts" read the papers they decide lives on.

It is looking to me like there is an imperfection in the process of the papers given to the court, that and the ongoing investigation(s).

I am forwarding to you my email to Linda. She knew ALL of this back in June 2013. In my culture we use the word Chutzpah for her to make the statement she did to thinkadvisor.com

There are some people I did not list in the round up of who is aware of what is going on. I did meet with a Secret Service officer. I told him I would do a timeline. With all else going on and twenty days to answer the Motion Western/Bennett filed in the courts, you could say I am a bit distracted.

You know, I was disabled for 5 years and then I was almost killed in a car crash. I really need to start living again. AND I want my money plus everything I am owed on top of that.

The funny thing is, even this morning, someone said you are too bright to have let this happen, what college did you go to? I didnt go to college. I went to art school. I have an aptitude for puzzles and reading AND eventually, putting the puzzle pieces together in the way they fit.

I trained as the stuff I did because I wanted a job after I did well with my baby art. Couldnt get hired because I didnt go to college. I did what I have done my whole life- figured things out. Was hanging around horses shooting finishes at that time. This seem an ideal thing to study towards building databases of breakdowns. Well, I learned in time the track didnt care (Frank Stronach, Dinny Phipps.) The backstrech trusted me. I was asked to look up some data by a trainer. Nothing more needs to be said, I was in England a few months later, leaving my finances in the good hands of my advisor.....

Now you know the rest of the story.

Read the attached Hot Mic moment from the Arbitration. Says enough.

Thanks for taking me at face value.

If you have questions as to my authenticity, I know you could ask Terry Gainer. Cathy should remember me. I show up every so often. Do you recall when a month out from the inauguration, all cab drivers were pulled over? Me. I caught something- let Terry, Cathy, Sharon McGinnis, and an executive in the White House know. Public would not have heard where the tip came from. It wasn't important. Having a safe inauguration was.

Sincerely
Carrie Devorah

----- Forwarded message -----

From: Carrie Devorah [REDACTED]
Date: Fri, May 30, 2014 at 7:40 PM
Subject: Follow Up
To: "Fienberg, Linda" [REDACTED]
Cc: "Niedermayer, Jackie" <[REDACTED]>

Dear Linda,

It has been almost a year since I came to your office. I believe I was still on my cane. And as it was, less than a week later my back was diagnosed broken. I came out of the "cage" 2 days before my December 2013 arbitration that left me publicly branded "

You are quoted in Article One, stating "FINRA staunchly defends its forum. "We have no evidence whatsoever that the hearings are rigged," says Linda Fienberg, president of FINRA's dispute resolution and chief hearing officer, in Washington, D.C. "I would deny that it's a kangaroo court. We're audited internally by the SEC from time to time and by the Government Accountability Office (GAO). Brokers would be no better off in court, perhaps worse off versus arbitration."

Nothing is further from the truth than your words. Attached is a partial transcription of my Arbitration the result of which has publicly defamed me <http://www.brokeandbroker.com/2313/finra-arbitration-attorneys-fees/> as you see.

As you can read in the 15 minute Hot Mic moment that Susan Matthews was very aware of what the Senate is concerned over (attachment 2).

That's two bordering Three, Ms. Fienberg. Regulators are on notice with carefully compiled, organized data.

Schedule a meeting for us next week. We have a "rigged hearing" to address your words, "a kangaroo court." You will find a solution to address the scam pulled on my counsel and me. I don't know how the hell you ever give me back a birthday I lost, time, energy or other.

Ma'am, I was sick not stupid. You underestimated me. Frankly, I underestimated me. There are going to be a lot of changes in FINRA. I am leading that change.

Cordially
Carrie Devorah

(1)

<http://www.thinkadvisor.com/2014/05/20/finras-total-warfare-against-brokers-in-arbitratio>

(2)

<http://www.thinkadvisor.com/2013/08/05/finra-review-investor-choice-act-highlight-arbitra>

On Wed, Jun 5, 2013 at 9:59 AM, Fienberg, Linda [REDACTED] wrote:

Dear Ms. Devorah,

I work with Rick Ketchum who has asked me to get

in touch with you. I would be happy to meet with you at your convenience to discuss the matters that you raised in your email or to discuss your arbitration matters.

By way of background, I'm in charge of the arbitration/mediation program at FINRA; I also am the Chief Hearing Officer in charge of disciplinary hearings.

Please let me know when would be convenient for us to meet in person or by telephone. I am free next Monday afternoon from noon on if that is good for you.

I look forward to hearing from you, Linda Fienberg

**Linda D. Fienberg
President
FINRA Dispute Resolution
1735 K Street, NW
Washington, DC 20006-1506
tel 202 728-8407
fax 202 728-8833
www.finra.org**





Carrie Devorah [redacted]

FINRA Dispute Resolution Case No. 12-03894

1 message

Reicher, Terri [redacted]
To: "carriedev@gmail.com" [redacted]

Thu, Jun 26, 2014 at 2:37 PM

Dear Ms. Devorah:

I have been asked to respond to your most recent inquiries concerning your award, and the motion to confirm pending in the U.S. District Court for the District of Columbia.

The motion to confirm arbitration award pending in federal court is governed by the Federal Arbitration Act, not by FINRA rule, and the FINRA rule you cite has no bearing on the merits of the motion to confirm the award. FINRA rules bind FINRA firms and their registered representatives, but do not impose conditions precedent to a filing in federal court to confirm or vacate an arbitration award. FINRA's determination about your ability to pay the forum fees assessed against you has no bearing on the motion to confirm filed in federal court. They are two separate matters.

*FINRA is inapplicable to investment client
FINRA is securities broker-dealers only*

Moreover, the FINRA rule you cite is completely inapplicable to your award, in which the arbitrators found in favor of the respondents and awarded costs and attorneys fees to the respondents. The rule you cite only applies in to arbitration awards that award damages to a claimant against a firm or registered representative. Since the award in this case did not award you, the claimant, any damages, there was no requirement that the respondents notify FINRA in advance of filing the motion to confirm arbitration award.

Finally, I have reviewed your numerous complaints about the arbitration. Your sole remedy is to seek relief from the court, as Dispute Resolution generally loses jurisdiction over the arbitration once the award is issued. Dispute Resolution has responded to your complaints to the best of its ability, and considers this file to be closed. We will not be responding to you any further, and I have instructed Dispute Resolution to forward any future voicemails, correspondence and email to me.

We are sorry that you did not obtain the result in arbitration that you evidently felt entitled to, but we can do nothing further in this matter.

Very truly yours,

Terri L. Reicher
Associate Vice President
Associate General Counsel
FINRA
1735 K Street, N.W.
Washington, DC 20006
(202) 728-8967
FAX (202) 728-8894

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Carrie Devorah <[redacted]>

RE: CONFIDENTIAL: note from Carrie Devorah

1 message

Feigelman, Barbara <[redacted]>
To: Carrie Devorah <[redacted]>
Cc: "Moy, Julie" <[redacted]>

Mon, Oct 6, 2014 at 3:17 PM

Dear Ms. Devorah:

This is to acknowledge our receipt of your recent email correspondence dated October 2, 2014.

There will be no further comment from us on your email inquiry.

Barbara Feigelman | Vice President | Investment Bank | Client Services | **J.P. Morgan** | 3 Chase Metrotech Center, NY1-H051, Brooklyn, NY 11245 | T: 347 643 2575 | F: 973 463 5300 | barbara.feigelman@jpmorgan.com | jpmorgan.com

From: Carrie Devorah [mailto:[redacted]]
Sent: Thursday, October 02, 2014 9:40 AM
To: Feigelman, Barbara; Moy, Julie
Subject: Re: CONFIDENTIAL: note from Carrie Devorah

Dear Barbara and Julie

October 23 2014 is the filing date for papers in to the DC District Court in which Dawn Bennett, as you saw, along with Western International Securities, BGFS, and frequent FINRA attorney, not licensed to practice law in DC, David E Robbins.

You are notified I appealed the award of attorney fees to a non-licensed attorney, violating FINRA rules that require all lawyers appearing before FINRA to be licensed in that jurisdiction. You are aware of Bennett's Declaration claiming her/WIS/BGFS are allowed to use JP Morgan's IP, clearly marked for JP Morgan use only.

I am providing you/JP Morgan the opportunity to mitigate JP Morgan's exposure to the actions of WIS/BGFS and Bennett. It isnt a question of 'what'. It is a matter of 'how much' JP Morgan is exposed for.

Writing a clear stated letter to the court stating along with lines that 'this contract is between Devorah and JP Morgan, this contract is not between Devorah and WIS/JP Morgan, plain english, a requirement of the administration and SEC rules will be a step towards mitigating JP Morgan's exposure.

I recommend you consider writing a plain english letter not the prior letters that state the sky is ethereal and yada yada. You are aware the our correspondences are shared, this will be, too.

An email directed to the Courts or an email with the JPMCC letter attached is acceptable. Mitigating is important, Barbara. It weighs in, down the road, showing JPMCC/supervisory took pro-active steps to protect JPMCC and JPMCC client. Doing nothing, writing JPMCC is ceasing communication, is a PR nightmare.

Cordially
Carrie Devorah

WIS +
BGFS
had
"clients
directly s
JPM
Carrie
not
mentioning
either to
of BGFS

On Sun, Sep 7, 2014 at 2:11 PM, Carrie Devorah [REDACTED] wrote:

Dear Barbara

Your letter says you are going to do nothing about the crime to me from your client using your contract in court proceedings pretending it is their contract. I am sending you this email from WIS' Karen Chung. Your firm cannot pretend this crime did not occur, harming me. Your firm should have known this false representation of JP Morgan's contracts were taking place.

Sincerely

Carrie Devorah

----- Forwarded message -----

From: Karen Chung [REDACTED]
Date: Thu, Aug 12, 2010 at 12:56 PM
Subject: RE: CONFIDENTIAL: note from Carrie Devorah
To: [REDACTED]

Ms. Devorah:

Pursuant to your request on the other account, the information can be found on page 4, Item 9 (a) on Service Fees. I have also included the first and last page of the document for your review.

Karen Chung
Associate Director , Compliance
Western International Securities
70 S Lake Ave, 7th Floor, Pasadena, CA 91101
T: 626-710-3104 | F: 626-628-1757
[REDACTED] www.wisdirect.com

*the JP MCC clearing agreement
Signed directly by JP MCC not WIS
BGRS
JP Morgan Secp*

Member FINRA / SIPC

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Please consider the environment before printing this e-mail.

From: carriedev@gmail.com [mailto:[REDACTED]]
Sent: Thursday, August 12, 2010 9:20 AM
To: Karen Chung
Subject: CONFIDENTIAL: note from Carrie Devorah

Karen

Why is it you sent me the agreement for a retirement account rather than a general account agreement? Please send me the general account agreement.

Sincerely
Carrie Devorah

Sent via BlackBerry from T-Mobile

From: "Karen Chung" <[REDACTED]>
Date: Thu, 12 Aug 2010 11:12:43 -0500
To: <carriedev@gmail.com>
Subject: CONFIDENTIAL: note from Carrie Devorah

Ms. Devorah:

Pursuant to your request, I am including the "Individual Retirement Account Agreement" for you to review. Please note on the bottom of page 9 of the agreement in regards to commissions for transactions associated with the account.



page 1 Fees + Agreement

I have also attached a copy of your signed agreement for your review.

Should you have any further questions, please contact Brad Kaiser at 626-793-7717.

Karen Chung
Associate Director , Compliance
Western International Securities
70 S Lake Ave, 7th Floor, Pasadena, CA 91101
T: 626-710-3104 | F: 626-628-1757
kchung@wisdirect.com www.wisdirect.com

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Please consider the environment before printing this e-mail.

From: carrie devorah [mailto:[REDACTED]]
Sent: Thursday, August 12, 2010 5:29 AM

To: Karen Chung
Subject: CONFIDENTIAL: note from Carrie Devorah

Dear Karen

I looked again at the paper you said indicates my agreement to pay either commission or fee. I dont see the paper as agreeing to either mode of agreement. Are clients papers/agreements filed by your independent contractors with you? Is this a paper you would have in your records. Let us try this, will you please email to me the paper you want me to look for in my papers. Please send that paper to me today. Again this correspondence, our communication(s) are in absolute confidence not to be discussed outside of you and your boss until notice is given by me.

Sincerely

Carrie Devorah

--

Sincerely

CARRIE Devorah

Founder
THE CENTER FOR COPYRIGHT INTEGRITY

www.centerforcopyrightintegrity.com @godingovt

Where ARTS, IP, ID, IT and ENFORCEMENT Come Together in One Voice Against Online Theft Of Content and Commerce

CCIA : Profiler : trained MPI : LACBA-DRS : CA-BSIS Actively built the 1st discrete site crime analysis lab on a campus in North America

DISCLAIMER :

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--

Sincerely

CARRIE Devorah

DISCLAIMER :

With the continuing crossing and interfacing of platforms both on & off line both with & without our knowledge nor approval to note nothing sent over the Internet anymore is ever private nor should be presumed to be so. If it is that much of a secret, say nothing. If you must? Take a lesson from our military- hand write the note, chew then swallow

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Carrie Devora

Follow up to phone call Monday 3:39pm

1 message

Carrie Devora - [REDACTED]
 To: washington.feld@ic.fbi.gov

Mon, Mar 30, 2015 at 4:29 PM

I am following up to a call I made to your office Monday at 3:39pm

January 9, 2015 I filed a case in the DC court, case number 1:15-cv-00032 (CRC).

January 2012, I received in the mail an encrypted CD from the defendants, specifically from the Minnesota office. That office is under management of John Taft. The CD was sent to me through the US mails by Carolyn Guy, the firm's former attorney.

The encrypted CD took all of this time to grasp its content.

Concisely- from the day my accounts were transferred to RBC by the financial advisor I was a client of, my accounts were being robbed. I have reason to believe my accounts were being robbed earlier. The advisor was working at Prudential in 2002 before moving to RBC. The Prudential account statement on the Encrypted CD contains a Social Security number that is not mine.

I was living in CA in 2001, UK 2002, DC through 2013. I moved to Virginia in 2013. I reside in VA now.

The attached filings are detailed. The filings should be clear. What I laid out for you is the crime, the balance and check I did, that details the involvement of another entity, in the crime, FINRA. If you said you dont know what FINRA is, I would not be surprised.

FINRA is the "they" in the Bernie Madoff "They knew" statement that Madoff's crimes were known long before Madoff turned himself in.

In the run up to filing this matter in the DC court, I had already been providing data to the IRS and the USPS criminal fraud unit. As you see, RBC's attorney Carolyn Guy, emailed me the USPS confirmation notice of the Encrypted CD status.

The OSC is aware; as is the FCC, the FTC, the CFTC even notice was sent to the NY US attorneys along with to State security Bureaus that signed on to the Administrative Consent.

It is as if we were in parallel universes of the multi-states beginning their investigation in to RBC and me, covering Capitol Hill, telling both RBC and FINRA's CEOs their testimony was nothing like my experience with RBC as a "wealth management client." Moreso, I must have freaked out John Taft, RBC's CEO, because here he had just testified under Oath to Barney Frank, and me, one of the news photogs covering the event walks up to him and says 'Dude, ummm, that was not the truth' (paraphrased). Lying under oath to a legislator or lying in testimony to a government agent is a Federal Crime.

After the fact of receiving the Encrypted CD, I learned that RBC hastened to file corporate filings in states it had been operating in. In fact, the Beverly Hills office, of where I was (am technically still a client because my accounts are open just unfunded) is not licensed in the City of Beverly Hills. You have to be licensed to do business according to local law.

Again, the pleadings are pretty clear of what I uncovered on the encrypted CD- things like my accounts being at RBC 7 months before I signed papers to become an RBC client in 08/2002; faked Tax papers; faked account statements.

No one could have anticipated that within a week of the court matter being filed that someone wrote the IRS alleging to be writing on my behalf, requesting a change to IRS tax papers filed in 1999. I filed no such request.

In 1999, I became a client of Scott Sangerman, the investment advisor that moved me as a client of his with him to his new job at RBC where the crimes were taking place and known of by RBC through 2012 and present date.

Throughout the papers filed, you are going to read of references to FINRA. FINRA is under review by several entities. FINRA presents itself as being authorized by a statute of Congress. It is not. FINRA presents itself as being a protector of investors. It is not. FINRA is a private organization, filed with the IRS as a business league which must collect dues from its members. One such member is RBC. Another such member is JP Morgan where the hacker of my accounts works, still.

I did not know until 2014, the details of FINRA I now know of how FINRA operates. Nor does the Securities bureaus and others. Now they are learning. I attached for your education the disciplinary 'actions' taken by FINRA in December through March of 2015. You will read AWC, acceptance, waiver and consents, one after the other, for crimes that if you and I did them, we would be in jail for. So now you know how Bernie Madoff got away with his crimes as long as he did.

FINRA Disciplinary downloads & RBC request CFTC crime...

The CFTC and the states are benefiting from my papers. Bottom line, I set in to this to get back my funds. That is my goal. Helping others is adjunct.



Carrie Devorah [redacted]

Re: Remember we talked about FINRA- I did this Cathy.... patience is a virtue

1 message

Carrie Devorah [redacted]
To: "Lanier, Cathy (MPD)" [redacted]

Thu, Sep 17, 2015 at 12:55 PM

Dear Chief

I wanted to update you on FINRA.

As you can see from the attached emails, that FINRA found no wrong with the Investment Advisors in either matter as you can read in the email that FINRA senior examiner Kevin Suh. Suh forwarded my exchanged papers to DC.

LA based Suh said FINRA find no fault with either financial advisor. I had given documents to the SEC along with related agencies.

Your team has learned more about FINRA. I attached the SEC charges. I attached the Notice of the 10-13-2015 hearing to keep you ahead of the ball. FINRA does confirm the Respondent is licensed in DC, along with running businesses, several, in the DC area.

Additional papers are viewable via Pacer. gov, 1-14-819ESH. More answers are there. The judge decision to uphold the FINRA decision was followed with the Appeal that was filed but forced to withdraw. I dont have that case number. The odd thing was the Judge was out sick with a severe back injury during this time period. Legal news said her cases were sent to another judge. I was not.

There is more to every story as your team knows. I have diligently been peeling back the FINRA story, sharing both experiences with legislators including Eleanor, compelling enough to get the Bill HR 1098 circulating. I was able to show how FINRA keeps crimes from law enforcement. As you can read, FINRA determined the IA's did nothing wrong. FINRA closed the file.

The SEC opened it. The SEC is regulatory. Victims do not get compensated. Here is a piece where I cross compare FINRA sanctions to President Obama's commutants. You will see papers I found confirming FINRA misled enforcement when FINRA said they did not know Madoff sold 'no product.' FINRA did, since 50 years prior, decades that Madoff was not charged for.

The court papers in both matters tell a compelling story about harm to DC, VA, MD and other states' victims exacerbated if even covered up by FINRA. The SEC Acts of 1935, 1940, etc made it clear, by Congress, crimes detailed were what gets reported to cops.

I am aware of a few victims in VA and I know for sure 1 in MD. You see there is nothing in 2012. There was another DC case located in the DC courts, that does not appear on the U4. I was in 2012 as you see in the filings. Removal of data must be done via an expungement arbitration. FINRA confirmed in writing no arbitration hearing was held yet the data is gone.

Thank you again for all you do Chief. It is a hard job. I quarterbacked my PD on 9/11.

Sincerely
Carrie Devorah

On Thu, Sep 10, 2015 at 11:04 AM, Carrie Devorah [redacted] wrote:
<http://www.investmentnews.com/article/20150909/FREE/150909911/dawn-j-bennett-charged-by-sec-with-inflating-assets-and-exaggerating>

On Fri, Dec 14, 2012 at 4:20 PM, Lanier, Cathy (MPD) [redacted] wrote:
Carrie, where did this accident occur? I need follow up with the appropriate Commander.

On Dec 14, 2012, at 3:43 PM, "Carrie Devorah" [redacted] wrote:

- Vincent Gray [redacted]
- Allen Lew [redacted]
- Cathy Lanier [redacted]
- Gwen Benson Walker [redacted]
- Sharon Mcinnis [redacted]

December 14 2012

DC has a campaign stating "SEE SOMETHING SAY SOMETHING." http://mpdc.dc.gov/sites/default/files/dc/sites/mpdc/publication/attachments/seesay_poster.pdf

I saw something. I spoke up. I am escalating speaking up. I have the training to see this credible concern falling between the crack.

In preparing to address the matter of Bay Cab 20 (December 4) with my insurer, I learned firsthand, December 11th unlicensed drivers are driving cabs in the District. Coincidentally, December 11th was the day DC coordinated Inauguration preparedness. I am concerned. This is a risk for passengers, residents and guests to DC. This is a security concern.

I am cross credentialed as noted below. My certification as a CCIA is attached. I quarterbacked my PD on 9/11. I retired covering news in DC. I would rather be wrong than be right. I would feel I failed my credentialing if I was right and did not bring this oversight of cross-department dialogue to light.

My car shows no damage [Attachment 1]. Sharon Mcinnis of the Taxi Commission office ran the three names of a driver of Bay Cab 20 who represented to MPDC officer the damage on the cab [Attachment 2] was due to my car [Attachment 3]. Sharon advised me it is known that cab owners do rent their cars to drivers by the day/week or longer. The rental of a cab by its owner to an unlicensed driver is discovered only when someone makes this point to the cab commission unless the MPDC officer knows the regs a Hack must have the drivers DC Hack license prominently displayed in the cab- visor/back/etc. If a license is not present, the ONLY step an MPDC officer should take is calling the Hack inspectors to respond to the site to address the cab/driver. This was not the case. The officer should not have released the hack driver and/or cab based on the driver not being licensed let alone citing in to the report the car is owned by "Moe" [Attachment 4]. "Moe" is Mohamed according to cab ownership located at another address.

I called the cab number in Sharon's office. We both heard "Tony" say "Moe" isn't present. I drove past the site after my visit with Sharon. The address given to the cab owner "MOE" is an auto body shop. [Attachment 5] "Tony" appears to be the body shop next door. My insurance adjuster recognized the shop/address from the photo. All this in front of us, I am not understanding why it was not an alert on December 11 to the pre Inaugural meeting to make sure the various levels of enforcement are on the same page. Everyone wants to go home at the end of the day. How difficult should it be for MPDC to be told to call DC Taxi to vet that a driver of a cab is in fact licensed. How difficult is it for DC Taxi to have inspectors do the address drive by as I did.

I found Sharon to be professional. Her hands may be tied in driving the point home on taking her office seriously, my hands are not.

There is one month to the Inauguration. I volunteered to Sharon Mcinnis to write the tip sheet putting MPDC and DC Taxi on the same page [Attachment 5]. My offer stands.

Sincerely
CARRIE Devorah

CCIA : Profiler : trained MPI : LACBA-DRS : CA-BSIS

DISCLAIMER :

With the continuing crossing and interfacing of platforms both on & off line both with & without our knowledge nor approval to note nothing sent over the Internet anymore is ever private nor should be presumed to be so. If it is that much of a secret, say nothing. If you must? Take a lesson from our military- hand write the note, chew then swallow

<CARRIE DEVORAH CRIME ANALYSIS CERTIFICATION.pdf>

<2012 cab scan (notes to Gray).pdf>



Carrie Devorah [redacted]

Update BGFS-WIS

1 message

Carrie Devorah [redacted]

(Tue, Oct 6, 2015 at 10:26 PM)

Litigation clients are being solicited by law firms looking for injured clients of BGFS/WIS. The papers are organized "to tell a story." Papers are clustered in to folders.

Any of your oversight outside of the OIP has to be structured from your regulatory and enforcement oversight. The SEC agenda is restricted to the OIP.

Sincerely
Carrie Devorah

 2015 10 5 Updated papers BGFS WIS ROBBINS devo...

--
Sincerely
CARRIE Devorah
[redacted]

DISCLAIMER :

With the continuing crossing and interfacing of platforms both on & off line both with & without our knowledge nor approval to note nothing sent over the internet anymore is ever private nor should be presumed to be so. If it is that much of a secret, say nothing. If you must? Take a lesson from our military- hand write the note, chew then swallow



Carrie Devorah [REDACTED]

Bennett Group Financial Services, LLC and Dawn J. Bennett

1 message

Carrie [REDACTED] Fri, Oct 9, 2015 at 3:08 PM
To: [REDACTED]
Bcc: [REDACTED]

You are now walking the process of the sec regulatory process of financial crime against investors. This is the reality flip side to your fiduciary hearing just held, of the nice fiduciaries that testified alleging fiduciary papers being signed is a 'hardship' for them.

The RIAs must sign SeC AdV Part IIs with client interviewees before calling them clients. That can contain the fiduciary disclosure page 1 page top dead center in red.

Ms Bennett gave me neither a Form .ADV or the contract I was told to sign that she said would be signed then sent to me. I was told the copier wasn't working. Plausible reason.

At this time all signatures are accompanied with dates. Times should be required too along with the RIAs CRD and other numbers which should be on their business cards, websites, emails, etc. the URL to their FINRA broker check should be provided to.

I would go so far as to alert investors with a PSA warning that states if the investor believes they have been robbed to contact their local law enforcement. The accepted alert is 'See something say something.'

Investors do not understand that FINRA is not a government agency and not entitled to government protections.

I was in conversation w PIABa where a case precedence for FINRA claim is to be a quasi government agency was raised as their reluctance to sue FINRA. I told their lead guy that I have two emails that correct that fraud perpetrated on the top Court

1- that FINRA is a private business league and government does not sanction private businesses w government protections

2- the email from FINRA stating the same basically. This email is from a FINRA executive

Customers do not understand that the SEC in their 'judgment' will determine if the SEC ruling will provide investors a way to get their money back or as you see here, settle.

This fiduciary, below, has had client fiduciary problems for over a decade.

FINRA's email to be states clearly that FINRA, the forum disputes with fiduciary are funneled in to, saw no problem w this fiduciary the SEC has charged.

The process will be interesting for you to follow in balance to the testimony you heard.

I will testify if and when asked.

Sincerely
Carrie Devorah



Carrie Devorah [REDACTED]

Fwd: FINRA, Rep Leutkemayer & Cousin Dave (referred by Mark Mensak)

1 message

Carrie Devorah <info@centerforcopyrightintegrity.com>
Reply-To: editor@centerforcopyrightintegrity.com
To: [REDACTED]

Fri, Oct 16, 2015 at 2:13 PM

Dear Cynthia

I wrote you almost two years ago. You found no merit in my complaint. The SEC charged the advisor. To whom does one complain about the GAO to when the GAO staff gets their "judgement call" wrong.

You got it wrong. I just took the next step. Your step is to get it right, this time. Other people have been harmed since 1963 when Madoff was selling no product. The SEC had oversight. FINRA/NASD emerged promoting itself as a quasi government agency. It is a .org it is not a .gov

Sincerely
Carrie Devorah

ps

The below is a letter that was cc'd to a legislator and a committee. I have learned alot in the past two years. I have learned to let others know that others know.

Dear XXXX

XXXX XXXXX and I have something in common- FINRA. Mark is one of the many harmed by FINRA. I am an anomaly. FINRA found me in Bad Faith. If you dont believe me, listen for yourself as the FINRA trained arbitrators collude to end my arbitration then and there so the poor 'woman' could get back to work.

She got back to work. The Financial Advisor was charged by the SEC 9/9/2015. The charges? Everything I testified to under oath, even stating the matter was under investigation by the SEC, the IRS and the USPS.

Listen to the arbitrators debate who to believe. As you can see, FINRA trained arbitrators dont believe investors. As you can hear, FINRA trained arbitrators are aware of the Fiduciary conversations Congress continues to hold.

Now what? Well, I already had met with the staff of Sheila, Keith, Maxine and Eleanor and others. Bill HR 1098, The Investor Choice Act is out there.

I shared my documents with Congress and others. I share the lessons I learned along the way. Did you know that FINRA has NO Authority from Congress to engage with investment clients and investment advisors. FINRA does.

Did you know FINRA is not a neutral for investment DRS? FINRA cannot be a neutral. FINRA is a 501 c-6.

There is more you may not know that I continue to uncover and clarify for investors, media, legislators.

But start here, I was found in Bad Faith for telling a truth FINRA did not want told.
www.brokeandbroker.com/2313/finra-arbitration-attorneys-fees

Everything the SEC charged her with is what I testified about
www.sec.gov/litigation/admin/2015/33-9910.pdf
www.finra.org search her broker check.

I cant get lawyers willing to take on FINRA so I do my journalist thing and continue to write relevant to my themes of IP, ID theft, fraud. I do my investigator thing and dig up documents like the ones that show in fact FINRA/NASD knew 50 years ago that Madoff was selling No Product. Did you know that my Clearing House account the advisor should have closed in 2010 was still open in 2012 two years after I left? Did you know that the SEC and FINRA know that clients dead accounts are 'adopted' for financial fraud by Wall Street criminals? Respecting all I am is an investor, FINRA calls the term adoption. You will find an example in the piece I wrote cross comparing President Obama's commutants to FINRA frauds Congress laws are distorted to let them 'walk' without being jailed as was Eric Garner.

And I screen grab things to my site like those papers of Madoff. My pitch on the Bill, in addition to my papers was "Think Eric Garner, I cant breathe and think Wolf Of Wall Street." Then I show how the street cops knew where to find Eric and why Congress wrote rules that keep Wall Street criminals back on the streets hurting more people.

Then I tell people, "Think American Greed." I want that show to go off air from having no more victims to air US attorney tales of...

As you can read, Page 2, <https://www.sec.gov/aij/aljorders/2015/ap-3205.pdf> the SEC is pushing settlement, not jail as with Madoff and every other

potential Ponzi scheme case that happens because Congress wrote the SEC crime escape hatch laws.

As you can see the SEC investigator Darren Goins never confirmed with me the data he received from the IA. The SEC attorney, the SEC investigator state they use their judgment. I tell them bluntly they have no judgment. They have laws they must follow.

As you can read, FINRA said they would take no steps.

As you are seeing, the investor is the toy used for others to make their monies- NASAA, PIABA, FINRA- all business leagues. All this time these and other non-profit business leagues have played along with FINRA presenting itself to be a quasi government agency. No. You cannot be a little bit pregnant. FINRA is a .org not a .gov. FINRA takes SEC info at a zero dollar contract as I write in pieces I disseminate through my social media connections and website www.centerforcopyrightintegrity.com (search SEC, FINRA, Madoff)

The CFPB, the state securities commissions, SIPC, CFTC, FCC & FTC are regulatory oversight as is the GAO have their oversight- regulatory. It seems I am the only one telling investors Go To The Cops if you think you are robbed.

No one is looking out for the investor.

Moreso, FINRA using expungement to clear Wall Street backgrounds had created false financial crime statistics. Look at FINRA disciplinary monthlies, those are no where near the real number of frauds. Look there and know the financial crime valuations is off the FINCEN richter scale of the loss to constituents.

Read the FINRA LA investigator's email that no action was taken. Another email states he sent my files to DC headquarters.

Read the SEC investigator email. My emails/letters say nothing about a wrap fee; he read statements we provided evidence of in the arbitration that had been faked (dates out of sync, no printing on the back, data misplaced etc); no SEC Form ADV Part II a document not addressed by any of the witness fiduciaries, a key paper requiring fee/commission disclosures to be made to the potential client at the get go; commissions taken by an SEC approved fee only advisor not licensed to work with individuals...

The "numbers" the Arbitrators are discussing came from the Respondent who appeared at the arbitration. The firm, well, one needs to hear the lawyer say it himself. My accountant witness was not allowed to testify. All that said, read the SEC charges.

It took time. The SEC got it more right, from my papers.

4 FINRA DEVORAH Arbitration HOT MIC Files 154-1...

So there you go. If a government agency ever needs the ability to see the run around investors/constituents are sent on along with the push back to believing the consumer over the "regulator", here you go.

51 social media aliases.

Law firms advertising looking for victims to take in to FINRA.

Lawyers representing, for payment, clients in states the lawyer is not licensed in misrepresenting that FINRA gives them permission. Local cops having to fit these crimes in to their ordinances on the books.

FINRA is unhappy that I am circulating their emails. That is ok. I am unhappy. Investors that sued for \$1.95 mil and got back \$200K are unhappy.

In DC 3 shootings is a crime wave worthy of a Press Conference. No less than 7 published financial crimes reported against a Wall Streeter, and there is no press conference alerting other victims. Congress and the SEC do not alert the Wall Streeter customer list. Moreso, the charged Wall Streeter continues with business as usual- podcasts, radio show, dinner solicitations, etc. without a warning to the new potential client.

I am able to continue cooperating with Congress since my cooperation began in 2013. I live in Arlington. I will come to see you. When shall we meet.

Sincerely
Carrie Devorah
562 688 2883

Founder
THE CENTER FOR COPYRIGHT INTEGRITY
www.centerforcopyrightintegrity.com
Where ARTS, IP, ID, IT and ENFORCEMENT Come Together In One Voice Against Online Theft Of Content and Commerce
<https://www.youtube.com/watch?v=i93F73UYmsw&feature=youtu.be>

CCIA : Profiler : trained MPI : LACBA-DRS : CA-BSIS
Actively built the 1st discrete site crime analysis lab on a campus in North America

Licenser <http://ybltv.com/?p=306>

Retired White House News Photographers Association Alumnus Covering Capitol Hill and the White House for Almost a Decade

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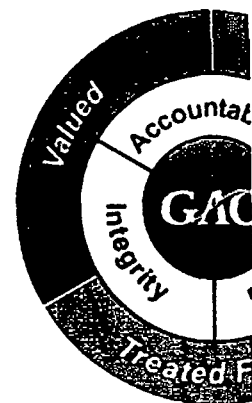
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Carrie Devorah [REDACTED]

CFPB Whistle Blower - AutoReply

1 message

CFPB_WHISTLEBLOWER <CFPB_WHISTLEBLOWER@cfpb.gov>
To: Carrie Devorah [REDACTED]

Thu, Dec 17, 2015 at 12:35 PM

Thank you for contacting CFPB. The information you provided may help inform CFPB's priorities and investigations.

If you perform work related to a bank or other consumer financial service provider and you report or object to a possible violation of consumer financial protection laws, you may be protected from employment retaliation. You have 180 days from the date of retaliation to submit a complaint to the Department of Labor. For further details, visit http://www.whistleblowers.gov/acts/dfa_1057.html.

If you contacted CFPB for assistance resolving an issue that affected you personally, please submit your complaint to our Consumer Response team at (855) 411-CFPB (2372) or <http://www.consumerfinance.gov/complaint/>.

Regards,

Consumer Financial Protection Bureau



Carrie Devorah [REDACTED]

CFPB Whistle Blower - AutoReply

1 message

CFPB_WHISTLEBLOWER <CFPB_WHISTLEBLOWER@cfpb.gov>

To: Carrie Devorah [REDACTED]

Thu, Jan 7, 2016 at 4:42 PM

Thank you for contacting CFPB. The information you provided may help inform CFPB's priorities and investigations.

If you perform work related to a bank or other consumer financial service provider and you report or object to a possible violation of consumer financial protection laws, you may be protected from employment retaliation. You have 180 days from the date of retaliation to submit a complaint to the Department of Labor. For further details, visit http://www.whistleblowers.gov/acts/dfa_1057.html.

If you contacted CFPB for assistance resolving an issue that affected you personally, please submit your complaint to our Consumer Response team at (855) 411-CFPB (2372) or <http://www.consumerfinance.gov/complaint/>.

Regards,

Consumer Financial Protection Bureau



Carrie Devorah



Addressing Disgorgement

1 message

Carrie Devorah <[redacted]>
To: rinaldi@sec.gov

Thu, Feb 25, 2016 at 5:42 PM

Mr. Rinaldi

If all lawyers were ethical there would be no Bar Associations, Rules, Ethics, disciplinary committees, Unauthorized Practice of Law committees or jails bunking them with 3 squares a day and clean clothes.

A phrase I grew up being guided with is 'you sleep with dogs you get fleas.' I stand by my hearing your wanting to do a good job. I want you to do the greatest job you can. For that reason alone, I have continued to cooperate with the SEC since 2010.

The SEC wasnt seeing the proverbial rest of the story.

Now it is. Shame you dont offer investors the same respect you described. Your job is not to be bezzies with Defense counsel but to be friend the citizens Defense counsels scam. Without that perspective clear for who you work for, defense counsels I had the honor to meet make great livings defending clients.

Below is a list of data the ethical attorney I am sure has voluntarily disclosed to you in his lovely exchanges with you.

Attached are relevant documents.

Cordially

Carrie Devorah

[A starting list of funds to be disgorged from Bennetts/WIS and JPMCCs for return to investment clients is below]

MONIES TO BE DISGORGED

_____ Where Claw Back of Dawn Bennett's \$15 million will come from [SEC Announces Intent For \$15 Million and Disgorgement] (Attached- www.law360.com/articles/751663/sec-wants-1)

COURT: Fees were paid to the DC court to file the Civil matters (i) Bennett v Devorah (ii) Bennett v SEC

FINRA: Fees paid to FINRA for the DRS. Each side splits the expense.

DELAWARE (corporation filing fees)

BROKERAGE(s):

ROYAL ALLIANCE ASSOCIATES
WESTERN INTERNATIONAL SECURITIES

ACCOUNTANT(S)/AUDITOR(S):

CLEARING HOUSE:

____ JP Morgan Clearing Corp.
Attention: General Counsel 7th floor
One Metrotech Center North
NY 11201-3859
643 2575 | F: 973 463 5300

Brooklyn
T: 347

www.jpmorgan.com

BARRONS MAGAZINE:

Matthew Barthel the Barron's editor told me that sometimes people pay a fee to get listed in the Top 5 of the Top 100. Bennett did not have \$1.1 billion under management. Bennett had to produce papers to be vetted to qualify in the top 100, let alone the Top 5. This leads one to conclude, until proven otherwise, that a fee will have been paid to Barrons, money to be disgorged to Bennett's clients.

(i) Gary Holland | Publisher, Vice President

gary.holland@barrons.com www.barronsmag.com
t. 212.597.5928 (direct)
f. 212.597.5688

1155 Avenue of

the Americas
New York, NY | 10036
(ii) Matthew Barthel

Matthew.Barthel@barrons.com
matthewbarthel@hotmail.com
(iii) Barron's Winner

Circle
<http://www.barrons-conferences.com/advisor-rankings.html>

BENNETT SEMINARS Tysons Corner and Maryland:

____ Bennett, not licensed on U4 for giving education,
conducted seminars at restaurants and hotels in Tyson's Corner and Maryland

BENNETT RADIO SHOW:

(i)

Bennett paid for radio time for shows on:
wmal.com 202 686 3100

3451

Their public relations firm is Golden Solutions (PR) 212 319
CUMULUS MEDIA INC.

(ii) Radio America COO Mike Paradiso
[com/tag/dawn-bennett/
program/financial-myth-busting/](http://www.radioamerica.com/tag/dawn-bennett/program/financial-myth-busting/)

<http://www.talkers.com>
<http://www.radioamerica.com/>

Financial Myth Busting Producer- Tom Elliott www.linkedin.com/in/tomselliott

Bennett's relationship with Peter Schiff www.schiffradio.com, www.europac.com

RENTS PAID (in the least, these addresses):

Bennett Group Financial Services aka BGFS www.bennettgroupfinancial.com

Bennett Group of Mutual Funds, Bennett Group Master Funds (Caymans) _____

2 Maplewood Drive, Ellington Court 06029 DCISB (page 31 of 60- U4)

5620 Wisconsin Avenue #21C Chevy Chase MD 20815
Number 77090399 [USPTO "Bitch Elegant Trademark]

Serial

5610 Wisconsin Avenue Chevy Chase MD 20818

5335 Wisconsin Avenue NW
Washington DC 20015
202 216 4880

5335 Wisconsin Avenue NW Suite 500,
Bennett Group Financial Services LLC
Washington DC 20015

5335 Wisconsin Avenue NW Suite 501
Group Financial Services LLC
20015

Bennett
Washington DC

1400 K Street NW #501
hington DC 20005

Was

Dawn J Bennett Holding LLC Filed Delaware, 6-29-2007, File # 4381031
5335 Wisconsin Avenue NW suite 500
Washington DC 20015

DJB Holdings Inc

4106 Howard Avenue
Kensington MD 20895 301 897 2185
www.djbennett.com

BENNETT EMPLOYEES (FINANCIAL):

EMPLOYEE SALARIES/FEEES

/COMMISSIONS (BGFS/WIS)

John Koorey Chief Operations Manager CRD #703117

Bradley Mascho CRD # 2039720

Kathleen Cassandra Pruess Operations Specialist, alleged UPSTO filings was an attorney (no longer at BGFS)

Michele Lee Morris Financial Advisor (no longer at BGFS)
Not FINRA registered since 10/2009 * (update; is working again in VA)

Stuart Whitney Rogers President
CRD #5708679

Tim Augustin Chief Operating Officer
Chief Compliance Officer
(626) 793 7717

WESTERN INTERNATIONAL SECURITIES STAFF (IARD #39262)
5335 Wisconsin Avenue NW #500
Washington DC 20015

Concept Brokerage Holdings (100% owner Western International)
Bizub President File Number: C3195292 California Foreign Corporation (3/23/2009) Donald 1700
Lincoln St Ste 2200 Denver Colorado 80203-4522
Registered Agent: Darcie Jean Coy File Number: 2/1/2010 1700 Lincoln St Ste
2200 Denver Colorado 80203-4522
(720) 932 6723
1642 S Parker Road Denver Colorado 80231-2915
(303) 369 0799

Bradley Clifford Kaiser CRD# 2523397

Karen Chung Associate Director Compliance kchung@wisdirect.com

ATTORNEYS (FUND/LITIGATION):

BGFS ATTORNEYS:

Matt Okolita (not licensed in DC in 2013 www.dcbbar.org)

Harry J. Jordan 1101 17th Street NW #609 (licensed in DC)
Washington DC 20036-4718
202 296-2900

hjjlaw@msn.com

(represented Bennett & WIS in civil matters (i) to collect FINRA award in the DC Court of Judge Ellen Huvelle (ii) threatened DJB SEO Contractor Scott Pierson)

Kaufmann Gildin Robbins & Oppenheim LLP

David E. Robbins (represented Bennett/Wis/BGFS/Bizub in FINRA arbitration)

Sam A. Silverstein

www.kaufmanngildin.com (worked on the case)

Arthur

Baer www.kaufmanngildin.com

777 Third Avenue, 24th Floor

New York, NY 10017

David E Robbins (licensed in NY, not in DC. Unauthorized practice of law to represent Bennett in FINRA)

(212) 755 3100

drobbins@

kaufmanngildin.com

BIRGE & MINCKLEY, P.C. (Sent first letter responsive to notice of FINRA complaint)

Thomas D Birge

(direct

dial)(303)869-7341

tbirge@birgeminckley.com

9055 East Mineral Circle Suite 110

Centennial Colorado 80112

(303) 860

(Fax)

7100

(303) 80 7338

Greenberg Traurig (was involved in a different BGFS FINRA arbitration)

Dennis J.

Block

(appeared for WIS - Kerry Edwards FINRA 13-00612)

blockd@gtlaw.com

Daren A Luma

200 Park

Avenue

NY NY 10012

(212) 801 9200

Kuglar Law

(was involved in a different BGFS FINRA arbitration)

Craig H Kuglar (represented

(matter of Kerry Edwards FINRA

309 N Highland Avenue

Atlanta GA

Royal Alliance Associates)

13-00612)

NE, Suite A

30307

Markun Zusman Freniere Compton LLP (was involved in a different BGFS FINRA arbitration)

Jeffrey K

Compton

17383 West Sunset Blvd Suite A380

Pacific Palisades CA 90272

(Involved in the Arbitration of Kerry v

Bennett)

Trademark Attorney(s)

Law Office of Michael J Souders

Dawn Bennett and Jonathan D Reichman Esq

Kenyon & Kenyon LLP

1 Broadway

NY NY 10004-1007

212 405 7200

tmocketny@kenyon.com

BENNETT GROUP OF FUNDS:

(BENNETT CONSERVATIVE CAYMAN SERIES, BENNETT MODERATE CAYMAN SERIES, BENNETT GROWTH CAYMAN SERIES, and BENNETT AGGRESSIVE GROWTH CAYMAN SERIES (the "Cayman Series") have duly caused this Registration Statement to be signed on their behalf by the undersigned, thereunto duly authorized, in Washington, DC on the 6th day of June, 2011)

(i) Jonathan M. Kopcsik, Esq

Stradley Ronon Stevens & Young LLP

Group Foundation For Family, Fitness and Finance
Group International LLC
Group Inc
Bennett Group Ltd
Services Inc (<https://icis.delaware.gov/l:corp/entitysearch/namesearch.aspx#>)
(<https://icis.delaware.gov/Ecorp/entitysearch/namesearch.aspx#>)

The Bennett
The Bennett
The
BGFS
BGFS Holdings LLC

BUSINESS(es) FASHION:

DJB HOLDING LLC; NON-INVESTMENT RELATED; HOLDING
COMPANY FOR CLOTHING LINE (Attached- FINRA brokercheck.org- Dawn Bennett PDF)

bElegance
Bitch Elegance
DJ Bennett
Dawn J Bennett Holding Llc
Dawn J Bennett Holding LLC

5335 Wisconsin Avenue NW #501
(Registered Agent), 12-7-2011, L0000055537
Holding LLC
www.djbennett.com

615 S Dupont Highway, Dover DE 19901, Filing Date 7-6-2007 Z12010542
Stuart Rogers
DJB

BENNETT EMPLOYEES (FASHION):

BENNETT FASHION:

President/ Vice President (DJBennett Collection) Marion Schwindeman and life partner
Paula Romano (Redding, Connecticut)

phone: 203-917-0337
adventuresmarketing@gmail.com
promano@djbennett.com

DJBennett's chief merchant: Bonnie Pressman (former buyer for Barney's)
Bonnie Pressman's title says "Board of Advisors"

SEO consultant- Scott Pierson
203-952-8442
scottpier@yahoo.com
scott@theexecutiveseo.com
theexecutiveseo@gmail.com

BGFS Attorney/model: Justin Sampson JD, Georgetown Law jsampson@djbennett.com
DJBennett COO & General Counsel

Schuyler Rice 603-513-2382 Schulyer Rice srice@djbennett.com [whois.com
] Schuyler Rice Design and Marketing Consultant

Leigh Ann Saperstone- photographer

Production

Associate- DJ Bennett April 2012-May 2013 (1 year, 2 months)

Anderson McNeill VP-GMM at DJ Bennett "The World Of Sporting Luxury"

Marketwired.com (does the press releases)

Dawn Bennett Vogue TV showing the highly skilled chinese Dawn Bennett imports and employs to paint Bennett's 6000+ patented jeans with removable brooch; the model, the shoot, Juan Carlos Castro the shoot director, the model "UBA" (?), the vintage inspired pieces of museum quality luggage that Bennett's patented jeans are packed in, etc. The video shows furniture and artwork and clothing in this video the teams will look for (i) in receipts (ii) physically in person (www.youtube.com/watch?v=VpCj4lInlMA) (www.youtube.com/watch?v=VpCj4lInlMA)

Payments to Boutique PR agency (Attached- <https://warschawski.com/>)

Press Releases issued through Releasewire distributions released through worldnow.com

-

FASHION

FASHION COLLECTION ATTORNEY:

Justin Sampson (not licensed in DC while doing legal work for BGFS). Also male model for DJBennett collection

BENNETT CHARITY:

THEY'RE JUST KIDS FOUNDATION; NON-INVESTMENT RELATED; BOARD MEMBER (Attached- FINRA brokercheck.org- Dawn Bennett PDF) [Note: The IRS had taken away the Non Profit status]

Ms. Bennett's charity <http://www.theyrejustkids.org/> had its IRS status removed. The charity is cross promoted, still, on Bennett's website(s) and FINRA brokercheck.

PATENT (PANTS WITH REMOVABLE BROOCH): _

Design patent- Pants- D682510 (Attached- <http://www.freepatentsonline.com/D682510.pdf>)

BENNETT TRADEMARK FEES PAID TO THE USPTO:

(Bennett testified under oath her fashion business started after I

left being her client)

Bitch

Elegance, Classic Chase, Baby Bitch Elegance, Dawn J Bennett's Fairy Tale Finances, B.EleganceWorld, fancy, Belegance, Classic Chase, C. Chase, Lady Leatherpop Trademarks "Bitch Elegant and Classic Chase" licensed lines. Bennett had upwards of 70+ trademarks, researchable either on the USPTO TESS site or via sites like Trademarkia. Trademarkia also lists the name(s) of employees and law firms that were paid by Bennett (<http://www.trademarkia.com/dawn-bennetts-inside-out-finance-78932761.html>)

B.ELEGANCE 5610 Wisconsin Avenue #21C
Chevy Chase MD 20815

BITCH ELEGANCE 5610 Wisconsin Avenue #21C
Chevy Chase MD 20815

Dawn Bennett Collection www.dawnbennettcollectionn.com
Property of DJB Holding
Vogue TV www.youtube.com/watch?v=VpCj4lInlMA

-

LUXURY ITEMS (payments)

Penthouse: \$,1801,666b(5610 Wisconsin Avenue)(Attached- www.city-data.com/montgomery-county/w/wisconsin-avenue-63.html)

Jaguar payments:

Trips to China (refer to Vogue TV youtube video)

Expansion in to China (2013) Attached- www.marketwired.com/press-release/djbennett-launches-luxury-sports-retail-destinations.1700510.htm)

DJ Bennett (showroom Chevy Chase) items in including but not limited to leather chair vintage ice ax signed by Sir Edmund Hillary (http://www.urbandaddy.com/dc/gear/21123/DJ_Bennett_Appointment_Only_Sporting_Goods_in_Chevy_Chase_DC_DC_Store)

Inventory includes but is not limited...

\$502

fishing boots

\$680 skiing hats

\$13,500 golf bags

\$650 neoprene suits

\$450 snowboarding googles with built in GPD

capabilities

COWBOY STADIUM:

Ms. Bennett leased an executive suite at Cowboy Stadium since 2007, at the cost of \$500,000 a year. Bennett owed funds for 2012 and 2013. Cowboys sued. (\$500K X (2007-present date=) Settled \$7.3 million law suit.

Cowboys attorney, Arnold Shokouhi[1], managing partner in McCathern Law settled the matter with Bennett aware the SEC investigation was underway with a potential disgorgement for funds paid by Bennett

832-533-8689

F: 832-213-4842

Arnold Shokouhi arnolds@mccathernlaw.com

<http://www.mccathernlaw.com/contact>

<http://bizbeatblog.dallasnews.com/2014/11/dallas-cowboys-sue-financial-advisor-for-7-3-million-over-att-stadium-luxury-suite.html/>)

BENNETT SOCIAL NETWORKING ALIAS: (Each domain name, each site host requires payment for that online presence access)

1. <https://about.me/dawnjbennett>
2. http://www.advisorperspectives.com/commentaries/bennett_123013.php
3. www.belegance.com
4. <http://www.bennettgroupfinancial.com/dawn-j-bennett>
5. **Bennett Group Of Funds** http://www.sec.gov/Archives/edgar/data/1501521/000113542812000474/bennett_485bpos.htm
6. <http://www.businesswire.com/news/home/20060222005464/en/Dawn-J.-Bennett-Associates-Launch-Bennett-Group#.Vh3nPivYFWF>
7. <https://www.connectcv.com/people/Dawn-J--Bennett/B1421780869511>
8. <http://www.coroflot.com/dawn-jbennett>

9. <https://www.crunchbase.com/person/dawn-j-bennett#/entity>
10. <http://cv.myresume.com.au/people/Dawn-J--Bennett/B1421780869511>
11. <http://dawn-bennett.com/>
12. www.djbennett.com
13. <http://dawn-j-bennett.com>
14. <http://dawnjennettblog.com/>
15. **dawn-j-bennett.com/contact-dawn-bennett/**
16. <http://dawnjennett.net/>
17. <http://dawn-j-bennett.tumblr.com/>
18. <https://dawnjennett.wordpress.com/tag/dawn-j-bennett>
19. <https://www.emaze.com/@AOTTRZZT/Dawn-J-Bennett-Certified-Financial-Analyst>
20. <https://m.facebook.com/DawnJBennett>
21. http://www.fa-mag.com/author/157/dawn_bennett
22. <http://www.forbes.com/smartfinancialplanning/>
23. <http://gabriel9lai.nation2.com/dawn-j-bennett>
24. <https://plus.google.com/+DawnBennettFinancialMythBusting/posts>
25. <https://www.haikudeck.com/meet-dawn-j-bennett-business-presentation-LXYAn9KyAq>
26. http://identyme.com/user/get-resume/?user_id=18027
27. <https://www.linkedin.com/pub/dawn-j-bennett/5/120/54a>
28. <http://linkis.com/D5w1U>
29. <http://www.lookuppage.com/users/dawnjennett/>
30. <http://www.magcloud.com/user/dawn-j-bennett>
31. <https://themeefy.com/dawn%20jbennett/dawnjennettafinancialguru>
32. <https://www.mendeley.com/profiles/dawn-j-bennett/>
33. http://www.onwallstreet.com/article_listings/dawn-bennett-795.html
34. <https://www.pinterest.com/oddsvino/dawn-j-bennett/>
35. www.radioamerica.com/program/financial-myth-busting/
36. <http://www.releasewire.com/multimedia/photos/dawn-j-bennett-chief-executive-officer-39855.htm>
(content distributed through worldnow.com)
37. https://www.resumonk.com/nXz_r4gTQPCXHMvxgOZlxw
38. <http://tracks.roojoom.com/r/21739>
39. <http://cdn.stationcaster.com/stations/wmal/rss/6081.rss>
40. <http://www.sbwire.com/press-releases/financial-myth-busting-radio-show-with-host-dawn-bennett-interviewed-kishore-mahbubani-author-professor-public-policy-at-the-national-university-of-singapore-on-the-coming-asian-dominance-435533.htm>

41. <http://www.scoop.it/t/financial-advice-by-dawn-j-bennett/p/4034679480/2015/01/05/why-dawn-j-bennett-is-a-financial-voice-we-can-trust>
42. <http://www.slideshare.net/DawnJBennett>
43. <https://start.me/p/WaaELn/dawn-j-bennett?locale=ko>
44. <https://storify.com/DawnJBennett/financial-myth-busting-with-dawn-bennett>
45. <https://www.sunzu.com/dawn-j-bennett>
46. <http://www.thinglink.com/scene/614490158258978817>
47. <http://tunein.com/radio/Financial-Myth-Busting-p238348/>
48. https://twitter.com/Dawn_J_Bennett
49. <https://vimeo.com/dawnjbennett>
50. <http://vizualize.me/dawnjbennett#.Vh3VQsvYFWE>
51. wealthmanagement.com/author/dawn-bennett
52. dawnjbennett.weebly.com/
53. <https://m.youtube.com/channel/UCn-fzXTJwkhQcYs0AsV36QQ>
54. <http://www.nbcrightnow.com/story/29865094/dawn-bennett-host-of-radio-show-financial-myth-busting-interviews-chris-whalen-senior-managing-director-and-head-of-research-of-kroll-bond-rating>
55. **Releasewire distributions done through worldnow.com** (last count was over 60+ sites, not including sites to which Bennett's Financial Myth Busting transcribed interviews were attached to)

[1] <http://www.mccathernlaw.com/attorneys/partners/shokouhi>

Sincerely
CARRIE Devorah
562 688 2883
<https://www.linkedin.com/today/author/carriedevorah>
@godingovt

DISCLAIMER :

With the continuing crossing and interfacing of platforms both on & off line both with & without our knowledge nor approval to note nothing sent over the internet anymore is ever private nor should be presumed to be so. If it is that much of a secret, say nothing. If you must? Take a lesson from our military- hand write the note, chew then swallow

 2016 2 25 SEC DOJ pre March 2 cluster 2.pdf
21992K



Carrie Devorah <[REDACTED]>

Re: SEC Charged/Tried DC Investment Advisor with multiples of DE corporations Bringing to your attention

1 message

Weede, Shawn (USADE) <[REDACTED]>
To: Carrie Devorah <[REDACTED]>
Cc: "Custer, Keith A. (BA) (FBI)" <[REDACTED]>

Sat, Mar 26, 2016 at 6:19 PM

Copied here.

Sent from my iPhone

On Mar 26, 2016, at 10:07 AM, Carrie Devorah <carriedev@gmail.com<mailto:[REDACTED]>> wrote:

Dear Shawn

Please send me Mr. Custer's contact information.

Sincerely
Carrie Devorah

On Tue, Mar 22, 2016 at 2:09 PM, Weede, Shawn (USADE) <Shawn.Weede@usdoj.gov<mailto:Shawn.Weede@usdoj.gov>> wrote:
Ms. Devorah,

The assigned case agent is in the Baltimore division. His name is Special Agent Keith Custer.

Shawn A. Weede
Assistant United States Attorney
United States Attorney's Office for the District of Delaware
1007 N. Orange Street
Wilmington, DE 19801
302.573.6081<tel:302.573.6081>

From: Carrie [mailto:[REDACTED]]
Sent: Tuesday, March 22, 2016 12:58 PM
To: Weede, Shawn (USADE)
Cc: Hall, Jennifer (USADE); Van Pelt, Elizabeth L.(USADE); Englehart, Megan (CM); Hannigan, Patricia (USADE); Paxton, Lauren (USADE); Shannon.singleton@usdoj.gov<mailto:Shannon.singleton@usdoj.gov>; McCall, Jamie (USADE); Welsh, Jennifer (USADE)
Subject: Re: SEC Charged/Tried DC Investment Advisor with multiples of DE corporations Bringing to your attention

Thank you for writing, Shawn.

Yea this is the best email adress to reach me at. There is prior data that has been shared I will provide to agent Ford.

Sincerely
Carrie Devorah

Sent from my iPhone

On Mar 22, 2016, at 11:59 AM, Weede, Shawn (USADE) [REDACTED] wrote:
Ms. Deborah,

I have forwarded this email to Special Agent Tom Ford with the FBI. Is your email address below the best means to contact you?

Shawn A. Weede
Assistant United States Attorney
United States Attorney's Office for the District of Delaware
1007 N. Orange Street
Wilmington, DE 19801
302.573.6081<tel:302.573.6081>

From: Carrie Devorah [mailto:[REDACTED]]
Sent: Monday, March 21, 2016 4:04 PM
To: Hall, Jennifer (USADE); Van Pelt, Elizabeth L.(USADE); Englehart, Megan (CM); Hannigan, Patricia (USADE); Paxton, Lauren (USADE); [REDACTED] [mailto:[REDACTED]]; McCall, Jamie (USADE); Weede, Shawn (USADE); Welsh, Jennifer (USADE)
Subject: SEC Charged/Tried DC Investment Advisor with multiples of DE corporations Bringing to your attention

Pello

My name is Carrie Devorah. My techniques are outside the box and effective. You are now looped in to a matter that is multi-state, with DE's role being where this individual has created multiples of entities. For what gain? I think that the SEC has charged the person answers that question for you. The SEC messed up. I made sure the SEC got things headed in the right direction. I explain I was active in building the 1st discrete site crime analysis lab on a college campus on the continent- UCLA PD. 9/11 despite being told we were in the fall path of the Fed building, I went to work. I quarterbacked my officers. That alone, should profile for you that wrong must be addressed. The SEC asked for my help 2010 with WIS and BGFS. The SEC screwed up. Admittedly, by them, moreso seen that their 'credited' investigator Goins was not called to testify at the hearing. There are parties/persons not in the loop, as I call the aggregate of names that was built up from securities commissions to only recently include media contacts. My methodology is simple. Let everyone know what everyone else knows so no one can say they did not know, that people can pitch in and work together. Delaware's reputation for corporate invincibility is what drives people like Bennett to have so many DE entities (list included). I read your Title 8 I think it is. Lawful, is the word that jumped off the page.

<https://www.sec.gov/litigation/admin/2015/33-9910.pdf>

I did call the DE AG's office Friday. I was surprised at the receptionist. I researched cases your office brought forward which is how I got the names on top.

I dont know which names will go through. Whoever gets the email, you then are on official notice of this matter.

I can backsend you emails with data you will want to move forward.

Lawful.... that is your defining word. Someone the SEC is seeking \$15 million from is not lawful.

You are in the loop

Sincerely
Carrie Devorah

----- Forwarded message -----

From: Carrie Devorah <[REDACTED]>
Date: Mon, Mar 21, 2016 at 12:51 PM
Subject: BENNETTS DC Office Design with 'couture jeans' corner by VA designers wins award; BGFS interns; and Celebs named with DJBennett fashion





Carrie Devorah

NOTE FROM CARRIE DEVORAH- re Bennett Group, Dawn Bennett

1 message

Carrie Devorah <[REDACTED]>

To: "Keith A. Custer" <[REDACTED]>

Mon, Mar 28, 2016 at 3:38 PM

Hi Mr. Custer

You have just received as a bcc, an email you can see has alot of recipients.

I am Carrie Devorah, that Shawn Weede cc'd you on. I am the person that got the SEC back on track with the BGFS/WIS crime. I also happened to have built the crime lab at UCLA PD, maybe not a great thing to state when one has been victim to a crime. That said, I am the person that found and released the papers showing Madoff's crimes were known in 1963.

I figured out via my Bennett experience how these financial crimes have not been criminalized while Eric Garner was.

For whatever it is worth, the above said, I stand with officers. 9/11 I went to my PD without a second thought.

There is a history of papers with regards to Dawn Bennett and Western. I have done with this matter what I did with my officers

- (i) I figured out what was wrong
- (ii) I figured out what could be done to make things better

The Dawn Bennett matter is the 'model' others in the loop are learning from. The loop as I call the aggregated people are from different industries relevant to security and the fraud that comes with it. I sorta describe this is SERIAL in real time.

In a nutshell/Hollywood pitch- Dawn Bennett has had financial crimes covered up by a MD self regulatory entity since 1998 the date I found in the DC courts. Fast forward 2009, Bennett was the industry #5 out of 100 Barron's Top Women Advisors in America. Fast forward 2010, the SEC asked for my help, 8 months after I became and left being Bennett's client. I was disabled at the time but not sick enough to not know that I hired a fee advisor not a commission advisor.

The SEC screwed matters up. You will, as you research the matter, note that credited Darren Goins did not participate in the SEC hearing.

The hearing, the SEC is the problem. They are regulatory. What my papers are showing to my loop is that no one 'called the cops.' I knew all about FI cards, etc. The more papers I read, the more I realized where the balls were being dropped, hence my loop, sewing facts together.

There is no missing the multiples of crimes Bennett, her team, Western even JP Morgan are guilty of. Someone has got to get the guilt/crime part going.

Western International Securities a like a Walmart style brokerage, signed with Dawn Bennett CEO on July 27 2009 to give Bennett and her company access to Clearing privileges of JP Morgan Clearing.

JP Morgan gave clearing privileges to Bennett via the JPMCC client Western. There is a problem. The names on the statements that JPMCC sent to clients, allegedly, every month were for Western International Securities and a Bennett Group Financial Services, CEO Dawn Bennett. BUT the agreement WIS signed with CEO Dawn Bennett was for a firm called BENNETT FINANCIAL GROUP.

Bennett Financial Group is not the name on the client statements. Moreso, WIS was not licensed back in DC until 4/5/2010. WIS signed with two corporation CEO Dawn Bennett on 10/1/2009 giving Bennett and her staff 'employment' across the country.

So you see this matter is not so cut and dry. By quarterbacking this matter, by aggregating, sorting, sharing data I have continued to pull this matter forward. The SEC is looking good. I am doing the work sorting out details like FINRA the brokers business league does not report crimes like Bennetts to law enforcement. Sorta sad for me to hear from the AG he didnt know what FINRA is.

He does now.

Making things more muddled is that Bennett has been running multiple businesses out of the same office. Clients suing Bennett/WIS/Royal Alliance et al were unable to get discovery to confirm accounts are not being commingled.

Enough of the data I was pulling intimated at the mix of funds in to Bennett's 'funding herself' fashion empire. Last week I found an online brag by the design firm DCS for their winning Bennett Group Financial Services & couture jean showroom.

The SEC has asked for \$15 million and disgorgement and then some. I asked for something a bit more personal- removal of the bad faith that I got hit with in a slam dunk arbitration that was intended to shutter me inside a silent siloed business league forum investors are not granted by Congress to be taken in to.

Go look at Bennett's brokercheck. There is no red dot on 2012. There should be one, at least a redhead, the one at the other end of this email.

When do you want me to drive to Baltimore. I cannot lift boxes because of the disability residual. I can bring my PC or you can come here to Arlington.

The crime is nationwide. Bennett set her office up in DC, lives in MD, has other offices in MD, corporate setup in DE, radio show and 'classes' in VA and Chevy Chase

And Bennett did file a claim of unconstitutionality in MD which gives you nexus.

I have something I want to finish writing on the lawyers role in all of this, by April 7. I can come to you after April 7. You can come to me earlier.

Bottom line, all the elements are in place, it will be easy for you to see what are the laws that you can apply. Western, btw, had their DC license removed in 2006. Doesn't state that on WIS brokercheck. Their word is expunged. My word is Eric Garner did not get his crimes expunged. Law enforcement knew where to find him. Things are changing.

All we need now is law enforcement. I have several entities I will introduce you to coordinate. They have been in the loop with their permission since I met them. All we need now is you, a clarification for law enforcement that FINRA/NASD are covering up crimes and the accomplice attorneys (PIABA and others) that fly state to state falsely alleging they can represent clients inside FINRA's closed business league, without being licensed in that state, covering up crimes.

That is false.

<http://www.finra.org/arbitration-and-mediation/notice-attorneys-and-parties-represented-out-state-attorneys>

Ms. Bennett used lawyers in DC and the SEC matter. The ACT of 1940 is clear, lawyers that aid and abet are fined \$10,000 and even imprisonment.

Ms. Bennett was an investment advisor. WIS were investment advisors. Brokerage has been defined by FINRA to 'meet' Congress definition. <http://www.finra.org/arbitration-and-mediation/guidance-disputes-between-investors-and-investment-advisers-are-not-finra>

FINRA expunges crimes. <https://piaba.org/piaba-newsroom/piaba-report-data-show-finra-efforts-slow-expungement-broker-misconduct-has-failed-oc>

Again, no red dot for me in 2012 on Bennett/WIS brokercheck. Read what the entities write cautiously. The aggregate of my documents, that I got things to where they are now by organizing and reorganizing for each need the papers, speaks the volumes that will help you.

When do we meet? Where?

Sincerely
Carrie Devorah

ps go to my website www.centerforcopyrightintegrity.com Search FINRA, search Madoff. I made it easy. You will see a side by side comparison of the FINRA disciplined v President Obamas 45 commuted.

My site is colorful. I went to art school not college. That said, the screengrabs state everything.

—
Sincerely
CARRIE Devorah

<https://www.linkedin.com/today/author/carriedevorah>
@godingovt

DISCLAIMER :

With the continuing crossing and interfacing of platforms both on & off line both with & without our knowledge nor approval to note nothing sent over the Internet anymore is ever private nor should be presumed to be so. If it is that much of a secret, say nothing. If you must? Take a lesson from our military- hand write the note, chew then swallow



Carrie Devorah [redacted]

File Request - File Transfer

1 message

[redacted]

To: [redacted]

MICHAEL RINALDI

Tue, May 31, 2016
at 3:01 PM

rinaldim@sec.gov has requested a file from you.
Use the link below to send securely.

Per my earlier e-mail message.

Send Files Securely:

Please click on the link below to send files back:

<https://wft.sec.gov/a/wreq/zio08889wCafAIJNavYb5hmPKvHJjGmB>

The secure link is valid for 7 days or up to 1 transactions.

Secured by Ac



Carrie Devorah [redacted]

RE: Pnc - BGFS debit card

1 message

Custer, Keith A. (BA) (FBI) [redacted]

To: Carrie [redacted]

Thu, Jun 2, 2016 at 9:24 AM

Ms. Devorah,

Actually I will be in Phoenix for another case the week of June 13th. The Bennett case is moving forward. When the investigation goes overt I will let you know. I am getting the information I need for the case we are building. If I need something that I think you might be able to help with I will let you know. Please be aware that this case is one of a dozen cases that I am currently investigating and as a result I must constantly prioritize my time and resources to keep each case moving. I understand you want to meet, but I don't think that is a good use of either person's time at this point. We are focused on a very specific allegation that doesn't involve you as a party. Thank you for your patience and understanding.

Best,

I already had that entry in my 2012 papers entered in to DC District Court 2014

Special Agent Keith A. Custer, FBI
2600 Lord Baltimore Drive
Baltimore, MD 21244

From: Carrie [mailto:[redacted]]
Sent: Wednesday, June 01, 2016 9:37 PM
To: Custer, Keith A. (BA) (FBI)
Subject: Pnc - BGFS debit card

Dear Mr Custer

I am coming to meet you in person face to face on Tuesday June 14, expect me at 11:00am

You asked me to pull back on sharing data w other enforcement. I did.

I want to confirm my blind faith in conceding to your request.

The BGFS matter got to where it has because of my persistence. I want to affirm my decision.

I will see you Tuesday.

Carrie

Btw, BGFS used PNC for debit cards allegedly and JP Morgan for their checks.

BGFS had no clearing ability through JP Morgan

I would check the PNC - Bennett Financial group combo and the JP Morgan - BGFS combo and converse

Sent from my iPhone

Begin forwarded message:

From: "Kathleen Pruess" <[REDACTED]>
Date: February 9, 2010 at 2:57:01 PM EST
To: "carrie devorah" <[REDACTED]>
Subject: RE: question

Ms. Devorah,

I am stuck at home so I cannot tell you positively if you requests to have your trust set up with banking privileges, but if you did, it would either be through PNC (for the debit card) and JP Morgan Chase for the checks.

I will check when I'm able to get back into the office.

Very respectfully,

Kathleen C. Pruess

Operations Specialist

Bennett Group Financial Services, LLC


Toll-Free: (866) 286-2268
Direct: (202) 216-4880 Ext 105
Fax: (202) 216-4908
E-mail: kpruess@bennettgroupfinancial.com
Website: www.bennettgroupfinancial.com

***BGFS is a Family, Fitness and Finance™ Firm
Advising Affluent Investors for over 20 Years.
We Measure What We Manage.***

For over a quarter century, the experienced advisors of Bennett Group Financial Services, LLC have been successfully guiding clients through the complexities of wealth management. Bennett Group Financial Services provides individual investors, corporations and foundations with holistic investment strategies using unique portfolio solutions across a breadth of asset classes. The insight into market trends demonstrated by Bennett Group Financial Services has made the group a staple in the media with regular appearances on Fox News Channel, CNBC, Bloomberg TV, and MSNBC as well as being featured in *Business Week*, *Fortune*, *The NY Times*, *The NY Sun*, *Washington Business Journal* and others. Through attentive service and prudent, thoughtful advice, Bennett Group Financial Services, LLC strives to consistently provide its clients with the highest quality of guidance and personalized service available.

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P Please consider the environment before printing this e-mail. Thank you.

From: carrie devorah [mailto:
Sent: Monday, February 08, 2010 8:24 AM
To: Kathleen Pruess
Subject: question

Hi Kathleen

I am curious if I did/had asked you to set up a bank/checking account for/with me what bank would it have been ie. Citi, BofA or another.

Sincerest Regards

Carrie Devorah



Carrie Devorah [REDACTED]

SEC Response HO::~~00576309~::~HO

1 message

Fri, Aug 5, 2016 at 4:17 PM

"Helin" <helin@sec.gov> <helin@sec.gov>
To: [REDACTED]

Dear Ms. Devorah:

Thank you for your follow up emails to the U.S. Securities and Exchange Commission (SEC).

You will need to make a written Freedom of Information Act (FOIA) request for the additional information that you are seeking. You may make such a request using any of the following three methods:

- Use our online Request for Copies of Documents form, available at https://ts.sec.gov/cgi-bin/request_public_docs
- Send a fax to (202) 772-9337; or
- Submit a Freedom of Information Act (FOIA) written request to:

Securities and Exchange Commission
 Office of FOIA and Privacy Act Operations
 100 F Street, NE
 Mail Stop 2736
 Washington, DC 20549-2736
 Phone: 202-551-7900 or 202-551-8300
 Fax: 202-772-9337
 Email: foiapa@sec.gov

Please note there may be a fee associated with a FOIA request. Instructions on how to make a FOIA request can be found at <http://www.sec.gov/foia/howfo2.htm#send>.

We also encourage you to review our Frequently Asked Questions for FOIA services, located at <http://www.sec.gov/Article/foia-frequently-asked-questions.html>.

You also inquired as to what FINRA stands for. FINRA stands for the Financial Industry Regulatory Authority, a non-governmental agency regulating the securities industry which previously was known as the National Association of Securities Dealers (NASD).

Once again, thank you for contacting the SEC.

Sincerely,

Ms. Kerry McGovern
 Investor Assistance Specialist
 Office of Investor Education and Advocacy
 U.S. Securities and Exchange Commission
 (800) 732-0330

ref_00D30JxQy_500a017jWCFAA2:ref



Carrie Devorah [REDACTED]

OGIS Case Number 2016-00789

1 message

Hirsh Kravitz [REDACTED]

To [REDACTED]

Cc: "Livornese, John J." [REDACTED]

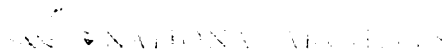
Thu, May 5, 2016 at 12:01 PM

Dear Ms. Devorah:

Please see the attached response to your request for assistance. Thank you

Hirsh Kravitz
Attorney-Advisor
Office of Government Information Resources (OGIS)
National Archives and Records Administration
[REDACTED]

 2016-00789 Devorah Final Letter.pdf
116K

[Top](#)

Committee Membership

Archivist of the United States David Ferriero appointed 20 members to the FOIA Advisory Committee in May 2014. The Committee consists of members from within the Federal government and 10 non-governmental members who have considerable FOIA expertise and who were selected to achieve a balanced representation. Committee members are appointed to serve a two-year term. Dr. James Holzer, Director of OGIS, is the Committee Chair.

Government Members

- **Dr. James Holzer, Chair**
Office of Government Information Services
- **Brentin V. Evitt**
Defense Intelligence Agency [↗](#)
- **Karen Finnegan Meyers**
U.S. Department of Defense
- **Larry Gottesman**
Environmental Protection Agency
- **James Hogan**
U.S. Department of Defense
- **Martin Michalosky**
Consumer Financial Protection Bureau
- **Ramona Branch Oliver**
U.S. Department of Labor
- **David M. Pritzker**
Administrative Conference of the United States
- **Melanie A. Pustay**
U.S. Department of Justice

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OFFICE of GOVERNMENT INFORMATION SERVICES

May 4, 2016— Sent via e-mail

Ms. Carrie Devorah
1505 Crystal Drive 303
Arlington, VA 22202

Re: Case No.: 2016-00789
NG: HK

NATIONAL
ARCHIVES
and RECORDS
ADMINISTRATION

8601 ADELPHI ROAD
OGIS
COLLEGE PARK, MD
20740-6001

web: www.ogis.archives.gov
e-mail: ogis@nara.gov
phone: 202-741-5770
toll-free: 1-877-684-6448
fax: 202-741-5769

Dear Ms. Devorah:

This responds to your April 22, 2016, request for assistance from the Office of Government Information Services (OGIS). Your request for assistance pertains to your Freedom of Information Act (FOIA) request to the Securities and Exchange Commission (SEC). Thank you for contacting OGIS.

Congress created OGIS to complement existing FOIA practice and procedure; we strive to work in conjunction with the existing request and appeal process. The goal is for OGIS to allow, whenever practical, the requester to exhaust his or her remedies within the agency, including the appeal process. OGIS has no investigatory or enforcement power, nor can we compel an agency to release documents. OGIS serves as the Federal FOIA Ombudsman and our jurisdiction is limited to assisting with the FOIA process.

After opening a case, OGIS gathers information from the requester and the agency to learn more ~~about the nature of the dispute~~. This process helps us gather necessary background information, assess whether the issues are appropriate for mediation, and determine the willingness of the parties to engage in our services. As part of our information gathering, OGIS carefully reviewed your submission of information, and we understand that you submitted a request for transcripts of testimony and exhibits from Administrative Proceeding (AP) 3-16801 (*In the Matter of Bennett Group Financial Services*). You asked for expedited processing and a fee waiver.

SEC FOIA determined that your request would be processed under the Commission's normal guidelines because you did not demonstrate a "compelling need" to obtain the requested record on an expedited basis. SEC FOIA also denied your request for a fee waiver. You appealed and the decision was upheld.

You contacted OGIS for assistance. Specifically, you asked OGIS for assistance in obtaining expedited processing and a fee waiver.





OFFICE of GOVERNMENT INFORMATION SERVICES

May 4, 2016 — Sent via e-mail

Ms. Carrie Devorah
1505 Crystal Drive 303
Arlington, VA 22202

Re: Case No.: 2016-00789
NG: HK

NATIONAL
ARCHIVES
JED RECORDS
ADMINISTRATION

8601 ADELPHI ROAD
OGIS
COLLEGE PARK, MD
20740-6001

web: www.ogis.archives.gov
e-mail: ogis@nara.gov
phone: 202-741-5770
toll-free: 1-877-684-6448
fax: 202-741-5769

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In working with agencies on cases similar to yours, we have learned that requesters must be able to provide the required elements for expedited processing and meet the required factors for fee waivers.

As SEC stated in the April 19, 2016, response to your appeal, a FOIA request may be processed on an expedited basis when the requester demonstrates a "compelling need." 5 U.S.C. § 552(a)(6)(E)(i); 17 C.F.R. § 200.80(d)(5)(iii). For the purposes of expedited processing, a compelling need means that a failure to obtain the records expeditiously "could reasonably be expected to pose an imminent threat to the life or physical safety of an individual," or if the requester is "primarily engaged in disseminating information, and there is urgency to inform the public concerning actual or alleged federal government activity. 5 U.S.C. § 552(a)(6)(E)(v); 17 C.F.R. § 200.80(d)(5)(iii). According to SEC, you did not claim to be primarily engaged in disseminating information nor have you shown a compelling need how the transcripts and exhibits of the administrative proceeding *In the Matter of Bennett Group Financial Services* requires expedited processing.

As it relates to your request for a fee waiver, the agency also explained the four factors a FOIA requester needs to show in order to qualify for a fee waiver. 17 C.F.R. § 200.80(e)(4)(ii).

As stated in SEC's April 19, 2016 response to your appeal, the commission determined that although your fee waiver request satisfies the first factor as the information you seek relates to the operations of the Commission, your request does not satisfy the remaining public interest factors as you fail to identify with any specificity how disclosure of the information would contribute to an understanding of specific government operations or activities. You also have not explained how you intend to utilize the requested materials, nor have you explained how the information you seek is of interest to a broad segment of the public.

I understand that this is not the response and outcome you had hoped to receive. However, I hope you find the explanation provided above useful to understanding why SEC responded as it did to your FOIA request and appeal. At this time, there is no further assistance that OGIS can offer you in this case.

Thank you for bringing this matter to OGIS. We will close your case.

Sincerely,



JAMES V.M.L. HOLZER
Director

cc: John Livornese, FOIA Public Liaison, SEC

We appreciate your feedback. Please visit <https://www.surveymonkey.com/s/OGIS> to take a brief anonymous survey on the service you received from OGIS.



Carrie Devorah [REDACTED]

Thank you for your recent contact

1 message

Whistleblower (Judiciary-Rep) <Whistleblower@judiciary-rep.senate.gov>
To: Carrie Devorah <[REDACTED]>

Thu, Nov 16, 2017 at 7:59 PM

Thank you for taking the time to contact the Judiciary Committee's Republican Oversight and Investigations staff. Your email has been received and will be reviewed. If you are a constituent of Senator Grassley's from Iowa, and did not provide your physical address please contact the personal office at the following link to ensure that you receive a reply: <http://www.grassley.senate.gov/constituents/questions-and-comments>

Unfortunately, if you are not a constituent, you may not receive an individual response due to the high volume of emails from around the country and the office's limited resources. You may wish to consider contacting your home state senators: http://www.senate.gov/general/contact_information/senators_cfm.cfm?OrderBy=state&Sort=ASC

We will contact you if further information is needed to inquire into the issues you have raised.

Although we cannot pursue every allegation that we receive, that does not mean your concerns may not have merit. You should consider reporting waste, fraud, abuse, or mismanagement elsewhere as well, if you have not already done so. Confidential, protected whistleblower disclosures can also be made to:

- the Office of Special Counsel (<https://osc.gov/pages/file-complaint.aspx>)
- the Office of the Inspector General for the Department of Justice (<http://www.justice.gov/oig/hotline/>), or
- the office of inspector general at another relevant agency (<https://www.ignet.gov/contact-us>).

If you report your concerns to one of these agencies, please let us know so that we can ensure that the agency treats it appropriately. Should you have additional information to provide, please do not hesitate to forward it to us at this email address. All disclosures are treated as protected, and none of the information will be used without consulting with you first. Thank you.

ERP TPW GDBL USAO 2016R00057

U.S. DISTRICT COURT
DISTRICT OF MARYLAND

NOV 29 PM 1:06

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**DAWN J. BENNETT and
BRADLEY C. MASCHO,**

Defendants

*
* **CRIMINAL NO. PX-17-472**
*
* **(Conspiracy to Commit Securities**
* **Fraud, 18 U.S.C. § 371; Securities**
* **Fraud, 15 U.S.C. §§ 78j(b) & 78ff;**
* **Wire Fraud Conspiracy, 18 U.S.C.**
* **§ 1349; Wire Fraud, 18 U.S.C. § 1343;**
* **Bank Fraud, 18 U.S.C. § 1344; False**
* **Statements on Loan Application,**
* **18 U.S.C. § 1014; Aiding and Abetting,**
* **18 U.S.C. § 2; Forfeiture, 18 U.S.C.**
* **§§ 981(a)(1)(C) and 982(a)(2)(A),**
* **21 U.S.C. § 853, and 28 U.S.C. § 2461))**
*

SUPERSEDING INDICTMENT

COUNT ONE

(Conspiracy to Commit Securities Fraud)

The Grand Jury for the District of Maryland charges that:

At all times relevant to this Superseding Indictment:

Introduction

1. Defendant **DAWN J. BENNETT** ("BENNETT") was a resident of Maryland.
2. Defendant **BRADLEY C. MASCHO** ("MASCHO") was a resident of Maryland and **BENNETT**'s associate.
3. **DJB Holdings, LLC** was a holding company solely owned and controlled by **BENNETT**.



Carrie Devorah [REDACTED]

RE: Holding company

1 message

Kalish, Benjamin [REDACTED]
To: Carrie Devorah [REDACTED]

Mon, Sep 25, 2017 at 9:33 AM

Carrie,

I think you may be confusing an Investment Company and an operating holding company. Operating companies can organize their businesses using a structure with a parent and many wholly-owned subsidiaries, having the parent hold the securities of those subsidiaries. Those wholly-owned subsidiaries typically are primarily engaged in multiple different lines of the operating company's business. In such cases, these companies are likely not investment companies subject to the Investment Company Act and therefore would not need to make the required disclosures under this Act.

However, there can be times that a parent holding company could become an investment company, such as where it no longer primarily engages in its operating business through its wholly-owned subsidiaries and instead primarily engages in investing, reinvesting, or trading in securities. Additionally, where a company holds, owns, invests, reinvests, or trades in securities totaling 40% of its assets it can be deemed an investment company and therefore subject to the Act.

Short of the above stated conditions, a parent holding company would typically not be subject to the Investment Company Act. If such a company were public, i.e. it sells its securities to the public, they would be required to file a registration statement with the Commission and file reports quarterly and annually after that which make certain disclosures. If you wish to know whether these operating companies make their securities holdings public, I can refer you to our Division of Corporation Finance who can better assist you with that question. I hope this helps.

Ben

From: Carrie Devorah [mailto:[REDACTED]]
Sent: Monday, September 25, 2017 9:04 AM
To: Kalish, Benjamin
Subject: Re: Holding company

Benjamin

Does a Holding Company have to disclose transparently everything that is in it?

Can the Holding Company have holdings in it, project it is working on that it does not tell people about?

Holding companies- are they only Holding Companies if it has investors?

Can it be a Holding Company if it does not have investors?

Is the Investor information public information?

Carrie

On Mon, Sep 25, 2017 at 8:35 AM, Kalish, Benjamin [REDACTED] wrote:

Carrie,

I am still not sure I understand what information you are looking for. Please feel free to give me a call and we can discuss further so I can better assist you.

Ben

Benjamin Kalish
Chief Counsel's Office
Division of Investment Management
U.S. Securities & Exchange Commission

202-551-7361 | [REDACTED]

DISCLAIMER: Guidance provided by staff via the telephone or email is informal and is not binding on the staff or the Commission. When submitting tips, complaints, questions, or other information to the SEC, please read the Privacy Act Statement located at: www.sec.gov/privacy.htm

From: Carrie Devorah [mailto:[REDACTED]]
Sent: Wednesday, September 20, 2017 10:30 PM
To: Kalish, Benjamin
Subject: Re: Holding company

Benjamin

A holding company is for securities/investments.

Entities put entities in to holding companies ie Alphabet put Google in to it, etc.

Explain

Also, my understanding is Holding Companies must be transparent. Industry practice is more to use the Holding Company as a veil.

Explain

Carrie Devorah

TCR_s

TCR_s

TCR_s

TCR_s

TCR_s

TCR_s

From SEC Staff WHISTLE BLOWER ACT UPDATE

There would be no need for whistleblowers if SEC staff knew + did their jobs as well as they

as joint whistleblowers).³⁰⁴ Table 1 reports the frequency distribution of these awards by award size. Forty-two of these awards were less than \$5 million, of which thirty-one awards were less than \$2 million. Of the remaining eight awards, five were at least \$5 million but less than \$30 million and three exceeded \$30 million.³⁰⁵ According to the Office of the Whistleblower, of the 55 individuals who have received awards, approximately 10 percent are high-ranking corporate executives at companies of varying sizes and a large majority of these executives received awards that were under \$5 million.

Table 1: Frequency distribution of whistleblower awards. We use awards issued to whistleblowers by the SEC Whistleblower Program from August 2012 through April 2018. Number is the number of awards that fall within an award size category. Percent is the number of awards in an award size category as a fraction of the total number of awards.

Award size category	Number	Percent
Less than \$2 million	31	62%
At least \$2 million but less than \$5 million	11	22%
At least \$5 million but less than \$10 million	2	4%
At least \$10 million but less than \$15 million	1	2%
At least \$15 million but less than \$20 million	1	2%
At least \$20 million but less than \$30 million	1	2%
At least \$30 million	3	6%
Total	50	100%

³⁰⁴ These totals treat as single awards several cases where whistleblowers' original information led to multiple covered actions that were processed together in one award order recognizing the total contributions of the whistleblower. Similarly, consistent with the approach proposed above governing cases where we grant an award for both a Commission enforcement action and a related action by another agency based on the same information provided by the whistleblower (see 17 CFR 240.21F-3(b)), we consider covered-action awards together with their corresponding related-action awards as single whistleblower awards.

³⁰⁵ One of the three awards that exceeded \$30 million was issued in September 2014 in a Commission action and related actions. See *Order Determining Whistleblower Award Claim*, Exchange Act Release No. 34-73174 (Sept. 22, 2014), available at <https://www.sec.gov/rules/other/2014/34-73174.pdf>. The other two awards were issued in March 2018 for \$49 and \$33 million, respectively, to three individuals (two of whom were acting as joint whistleblowers). See *Order Determining Whistleblower Award Claim*, Exchange Act Release No. 34-82897 (March 19, 2018), available at <https://www.sec.gov/rules/other/2018/34-82897.pdf>. We note that these three awards alone reduced the balance of the IPF by approximately \$112 million.

In addition to summarizing the distribution of awards to whistleblowers, we also summarize the distribution of awards by enforcement action. For each enforcement action, we identify all whistleblowers who receive an award for that enforcement action and sum up their awards to arrive at the aggregate award for that enforcement action. Table 2 indicates that between August 2012 and April 2018, there were 45 enforcement actions for which the Commission issued whistleblower awards.³⁰⁶ Thirty-seven enforcement actions had awards of less than \$5 million, of which twenty-eight awards were less than \$2 million. Of the remaining eight actions, six had aggregate awards of at least \$5 million but less than \$30 million and only two had an aggregate award that exceeded \$30 million.

Table 2: Frequency distribution of awards by enforcement action. We use awards issued to whistleblowers by the SEC Whistleblower Program from August 2012 through April 2018. For each enforcement action, we identify all whistleblowers who receive an award for that enforcement action and sum up their awards to arrive at the aggregate award for that enforcement action. We then plot the distribution of aggregate awards by enforcement action. Number is the number of aggregate awards that fall within an award size category. Percent is the number of aggregate awards in an award size category as a fraction of the total number of awards.

Award size category	Number	Percent
Less than \$2 million	28	62%
At least \$2 million but less than \$5 million	9	20%
At least \$5 million but less than \$10 million	3	7%
At least \$10 million but less than \$15 million	2	4%
At least \$15 million but less than \$20 million	0	0%
At least \$20 million but less than \$30 million	1	2%
At least \$30 million	2	4%
Total	45	100%

³⁰⁶ As noted, we aggregate related actions with their corresponding Commission actions for purposes of this analysis.

4. Estimates of current annual wages

Prospective whistleblowers' annual wages are potentially relevant to various aspects of the proposed rules. Table 3 presents, by industry, the pre-tax annual wages per employee ("average wages") estimated by the Bureau of Labor Statistics for 2016.³⁰⁷ Average wages vary from a low of \$22,445 in the leisure and hospitality industry to a high of \$98,458 in the information industry.

These averages do not reflect the substantial degree of within-industry wage variation. For example, more senior employees involved in financial activities likely earn higher wages than their more junior counterparts, and staff that supply significant expertise may earn more than those that do not. A survey of 2,499 firms registered with the Commission and included in the Russell 3000 Index as of May 2017 revealed median total CEO compensation at approximately \$3.8 million.³⁰⁸ A study of the 200 largest pay packages awarded to CEOs at U.S. public companies in fiscal year 2016 revealed that the median pay for this group of CEOs was \$16.9 million, while the average pay was \$19.7 million.³⁰⁹ A 2017 report documenting survey responses from 377 financial professionals included average base salaries for senior-level financial executives of between \$133,859 and \$342,154, depending on title and whether

³⁰⁷ Wage data used for calculating the annual wages per employee are derived from the quarterly tax reports submitted to state government workforce agencies by employers, subject to state unemployment insurance laws, and from Federal agencies subject to the Unemployment Compensation for Federal Employees program. Further information is available at <https://www.bls.gov/cew/cewbultn16.htm>.

³⁰⁸ See "CEO and Executive Compensation Practices: 2017 Edition" (available at: <https://www.conference-board.org/publications/publicationdetail.cfm?publicationid=7584>).

³⁰⁹ See "Equilar 200: Ranking the Largest CEO Pay Packages" (available at <http://www.equilar.com/reports/49-equilar-200-ranking-the-largest-ceo-pay-pakages-2017.html>) for a summary of the study and its findings. See "Equilar 200: The Largest CEO Pay Packages of 2016" (available at <http://www.equilar.com/reports/49-table-equilar-200-ranking-largest-ceo-pay-packages.html>) for the ranking of CEOs by their pay packages. See "How the C.E.O. Rankings Were Done" (<https://www.nytimes.com/2017/05/26/business/how-the-ceo-rankings-were-done.html>) for a discussion of the study's methodology.

Table 4: Annual income generated by a twenty year annuity. We assume that a lump sum upfront payment is invested in a twenty-year annuity to generate annual income over twenty years. We calculate different annual incomes by varying the upfront payment from \$5 million to \$50 million in \$5 million increments, and by varying the rate of return on the annuity from 2% per annum to 10% per annum in 2% increments.

	Rate of return				
	2%	4%	6%	8%	10%
Upfront payment					
\$5,000,000	\$303,530	\$363,588	\$429,859	\$501,864	\$579,013
\$10,000,000	\$607,060	\$727,176	\$859,717	\$1,003,728	\$1,158,026
\$15,000,000	\$910,590	\$1,090,765	\$1,289,576	\$1,505,592	\$1,737,039
\$20,000,000	\$1,214,120	\$1,454,353	\$1,719,435	\$2,007,456	\$2,316,052
\$25,000,000	\$1,517,650	\$1,817,941	\$2,149,293	\$2,509,320	\$2,895,065
\$30,000,000	\$1,821,180	\$2,181,529	\$2,579,152	\$3,011,184	\$3,474,078
\$35,000,000	\$2,124,710	\$2,545,117	\$3,009,010	\$3,513,048	\$4,053,091
\$40,000,000	\$2,428,240	\$2,908,706	\$3,438,869	\$4,014,912	\$4,632,104
\$45,000,000	\$2,731,770	\$3,272,294	\$3,868,728	\$4,516,776	\$5,211,117
\$50,000,000	\$3,035,300	\$3,635,882	\$4,298,586	\$5,018,640	\$5,790,130

Table 5: Annual income generated by a forty year annuity. We assume that a lump sum upfront payment is invested in a forty-year annuity to generate annual income over forty years. We calculate different annual incomes by varying the upfront payment from \$5 million to \$50 million in \$5 million increments, and by varying the rate of return on the annuity from 2% per annum to 10% per annum in 2% increments.

	Rate of return				
	2%	4%	6%	8%	10%
Upfront payment					
\$5,000,000	\$181,695	\$250,763	\$330,128	\$417,187	\$509,488
\$10,000,000	\$363,391	\$501,526	\$660,256	\$834,374	\$1,018,975
\$15,000,000	\$545,086	\$752,289	\$990,385	\$1,251,561	\$1,528,463
\$20,000,000	\$726,782	\$1,003,052	\$1,320,513	\$1,668,748	\$2,037,950
\$25,000,000	\$908,477	\$1,253,815	\$1,650,641	\$2,085,935	\$2,547,438
\$30,000,000	\$1,090,172	\$1,504,578	\$1,980,769	\$2,503,122	\$3,056,925
\$35,000,000	\$1,271,868	\$1,755,342	\$2,310,897	\$2,920,309	\$3,566,413
\$40,000,000	\$1,453,563	\$2,006,105	\$2,641,025	\$3,337,496	\$4,075,900
\$45,000,000	\$1,635,258	\$2,256,868	\$2,971,154	\$3,754,683	\$4,585,388
\$50,000,000	\$1,816,954	\$2,507,631	\$3,301,282	\$4,171,870	\$5,094,875

Table 6: Annual income generated by a sixty year annuity. We assume that a lump sum upfront payment is invested in a sixty-year annuity to generate annual income over sixty years. We calculate different annual incomes by varying the upfront payment from \$5 million to \$50 million in \$5 million increments, and by varying the rate of return on the annuity from 2% per annum to 10% per annum in 2% increments.

Upfront payment	Rate of return				
	2%	4%	6%	8%	10%
\$5,000,000	\$143,163	\$220,042	\$308,505	\$403,373	\$501,274
\$10,000,000	\$286,326	\$440,083	\$617,011	\$806,746	\$1,002,548
\$15,000,000	\$429,489	\$660,125	\$925,516	\$1,210,119	\$1,503,821
\$20,000,000	\$572,652	\$880,166	\$1,234,022	\$1,613,492	\$2,005,095
\$25,000,000	\$715,815	\$1,100,208	\$1,542,527	\$2,016,865	\$2,506,369
\$30,000,000	\$858,978	\$1,320,249	\$1,851,033	\$2,420,238	\$3,007,643
\$35,000,000	\$1,002,141	\$1,540,291	\$2,159,538	\$2,823,611	\$3,508,917
\$40,000,000	\$1,145,304	\$1,760,332	\$2,468,044	\$3,226,984	\$4,010,191
\$45,000,000	\$1,288,466	\$1,980,374	\$2,776,549	\$3,630,357	\$4,511,464
\$50,000,000	\$1,431,629	\$2,200,415	\$3,085,055	\$4,033,730	\$5,012,738

Table 7: Annual income generated from a perpetuity. We assume that a lump sum upfront payment is invested in a perpetuity to generate annual income in perpetuity. We calculate different annual incomes by varying the upfront payment from \$5 million to \$50 million in \$5 million increments, and by varying the rate of return on the annuity from 2% per annum to 10% per annum in 2% increments.

Upfront payment	Rate of return				
	2%	4%	6%	8%	10%
\$5,000,000	\$100,000	\$200,000	\$300,000	\$400,000	\$500,000
\$10,000,000	\$200,000	\$400,000	\$600,000	\$800,000	\$1,000,000
\$15,000,000	\$300,000	\$600,000	\$900,000	\$1,200,000	\$1,500,000
\$20,000,000	\$400,000	\$800,000	\$1,200,000	\$1,600,000	\$2,000,000
\$25,000,000	\$500,000	\$1,000,000	\$1,500,000	\$2,000,000	\$2,500,000
\$30,000,000	\$600,000	\$1,200,000	\$1,800,000	\$2,400,000	\$3,000,000
\$35,000,000	\$700,000	\$1,400,000	\$2,100,000	\$2,800,000	\$3,500,000
\$40,000,000	\$800,000	\$1,600,000	\$2,400,000	\$3,200,000	\$4,000,000
\$45,000,000	\$900,000	\$1,800,000	\$2,700,000	\$3,600,000	\$4,500,000
\$50,000,000	\$1,000,000	\$2,000,000	\$3,000,000	\$4,000,000	\$5,000,000

The annuity figures in Tables 4 through 7 are consistent with our belief that the proposed \$30 million floor should not negatively impact the overall pecuniary incentives faced by most



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

[REDACTED] 2013

Sean McKessy, Chief
Office of the Whistleblower
Fax: (703) 813-9322
McKessyS@sec.gov

Ms. Carrie Devorah
[REDACTED]
[REDACTED]

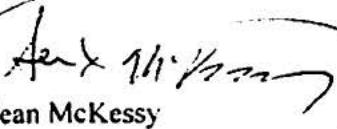
TCR Submission number: TCR13 [REDACTED]
Submission dated [REDACTED], 16, 2013

Dear Ms. Devorah:

This letter will confirm our receipt of the additional information you provided in connection with the referenced TCR submission. We appreciate your providing this additional information and have updated your file.

Thank you for your continued interest in the Whistleblower Program.

Sincerely,


Sean McKessy



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

[REDACTED] 2014

Sean McKessy, Chief
Office of the Whistleblower
Phone: (202) 551-4790
Fax: (703) 813-9322

Ms. Carrie Devorah
[REDACTED]

TCR Submission number: TCR14-[REDACTED]
Submission dated: [REDACTED] 11, 2014

Dear Ms. Devorah:

Thank you for the information that you submitted under the SEC's Whistleblower Program. We greatly appreciate your bringing this matter to our attention. The success of the whistleblower program depends on individuals providing the Commission with specific, timely, and credible information.

Members of the staff of the Division of Enforcement may contact you for additional assistance or information. In addition, we encourage you to submit any additional supporting information or materials that you believe will assist us in analyzing and fully understanding this matter.

On August 12, 2011 the final Whistleblower rules went into effect. It is now required that you submit a signed Form-TCR (including the declarations page) in order to be considered for a whistleblower award. You are encouraged to submit the form using our online questionnaire, which you can access at www.sec.gov/whistleblower. That website also has a link to a pdf of the Form-TCR that you may also complete and sign and send to us via hard copy at Office of the Whistleblower, 100 F Street, NE, Mail Stop 5971, Washington, DC 20549 or fax it to (703) 813-9322.

Thank you again for taking the opportunity to submit your information to us. Efforts by persons such as yourself are critical to the success of this program.

Please do not hesitate to contact the Office of the Whistleblower if you have any questions or concerns.

Best regards,


Sean McKessy



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

[REDACTED] 2016

Jane Norberg, Deputy Chief
Office of the Whistleblower
Phone: (202) 551-4790
Fax: (703) 813-9322

Carrie Devorah
[REDACTED]

TCR Submission number: TCR 14 [REDACTED]
Submission dated: [REDACTED] 30, 2016

Dear Ms. Devorah :

Thank you for the information that you submitted under the SEC's Whistleblower Program. We greatly appreciate your bringing this matter to our attention. The success of the whistleblower program depends on individuals providing the Commission with specific, timely, and credible information.

Members of the staff of the Division of Enforcement may contact you for additional assistance or information. In addition, we encourage you to submit any additional supporting information or materials that you believe will assist us in analyzing and fully understanding this matter.

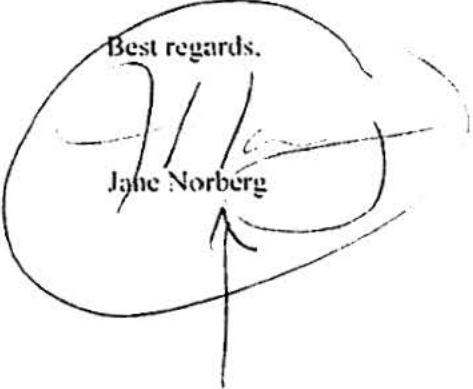
As a matter of policy, the SEC conducts its investigations on a confidential basis. The purpose of this policy is to protect the integrity of any investigation from premature disclosure and to protect the privacy of persons involved in our investigations. Accordingly, although working with whistleblowers and their counsel is very important to us, there may be very limited information we can share with you regarding what action, if any, we are taking in response to your submission. I hope you understand these limitations.

The Commission is only authorized to conduct investigations into possible violations of the federal securities laws. You should not expect the Commission to take any actions to the extent your information relates to conduct outside the scope or coverage of the federal securities laws. We may, however, in appropriate circumstances, refer your matter to another regulatory or law enforcement agency.

Thank you again for taking the opportunity to submit your information to us. Efforts by persons such as yourself are critical to the success of this program.

Please do not hesitate to contact the Office of the Whistleblower if you have any questions or concerns.

Best regards,


Jane Norberg



Carrie Devorah [REDACTED]

RE: Status was requested not disclosure: 16-04255-FOIA ID VERIFICATION

1 message

Ovall, Jeffery L. [REDACTED]
To: Carrie Devorah [REDACTED], "Jackson, Warren" [REDACTED]

Mon, Sep 12, 2016 at 4:18 PM

Good afternoon, Ms. Devorah. We understand that you are asking for the status of various TCR whistleblower submissions in the range TRC13 [REDACTED] to TRC13 [REDACTED]. Please note that the SEC conducts its investigations on a confidential basis and we are not able to provide updates on the status of a complaint. However, if you are the person who submitted the whistleblower complaints, if you provide proof of identity as explained in the letter Mr. Jackson sent you today, we may be able to provide a small amount of information.

I'm attaching the portion of our regulations that discuss verification of identity (17 CFR Section 200.303). The pertinent section is highlighted in yellow.

I hope this helps.

Thanks

From: Carrie Devorah [mailto:[REDACTED]]
Sent: Monday, September 12, 2016 3:36 PM
To: Jackson, Warren; Ovall, Jeffery L.
Subject: Status was requested not disclosure: 16-04255-FOIA ID VERIFICATION

Jackson,

Let me repeat myself. I am not asking for disclosures. I requested status.

Definition "Status"

The position of affairs at a particular time, especially in political or commercial contexts: "an update on the status of the bill"

Definition "Disclosure"

the action of making new or secret information known: "a judge ordered the disclosure of the government documents"

In that I prefer being above board in letting people know what I am doing

1) I am re-asking 3rd time for the status of all those cases

(i) completed (ii) denied (iii) limbo (iv) paid out whistleblower case

2) The next time I get the response you sent to me twice, I will expand the recipients as you are aware

Let me make it simpler. Trusting people are telling the SEC about crimes that have occurred. By law the SEC is obligated to report crimes to cops, to law enforcement. Failure to report crimes to cops makes that person, government or otherwise an accomplice to crimes. Being a USG employee does not make you exempt from failure to report crimes to cops. Being a USG employee holds you to an even higher standard of accountability to cops.

Your choice. The answers, or the world sees sooner than later that the SEC FOIA staff need assistance looking up word definitions because parsing participles makes the good people in your agency doing good work look bad.

Simple as that

(i) completed (ii) denied (iii) limbo (iv) paid out whistleblower case

Sincerely

Carrie Devorah

On Mon, Sep 12, 2016 at 3:16 PM, Jackson, Warren [REDACTED] wrote:

--


Sincerely

CARRIE Devorah

[REDACTED]
[@godingovt](https://www.linkedin.com/today/author/carriedevorah)

DISCLAIMER :

With the continuing crossing and interfacing of platforms both on & off line both with & without our knowledge nor approval to note nothing sent over the Internet anymore is ever private nor should be presumed to be so. If it is that much of a secret, say nothing. If you must? Take a lesson from our military- hand write the note, chew then swallow

 **17 CFR Section 200.303 (Verification of Identity).pdf**
1013K



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
STATION PLACE
100 F STREET, NE
WASHINGTON, DC 20549-2465

Office of FOIA Services

September 13, 2016

Ms. Carrie Devorah
1505 Crystal Drive #303
Arlington, VA 22202

Re: Freedom of Information Act (FOIA), 5 U.S.C. § 552
Request No. 16-[REDACTED]-FOPA through 16-[REDACTED]-FOPA

Dear Ms. Devorah:

This letter is in response to your requests, dated and received in this office on August 29, 2016, for information regarding the status of various TCR submissions. We assigned a separate FOIA tracking number for each request:

Request ID	Request Description
16-00115-FOPA	status of TCR1455654094355 - TCR1455654094365
16-00116-FOPA	status of TCR1413482853036 - TCR1413482853046
16-00117-FOPA	status of TCR1411492819354 - TCR1411492819364
16-00118-FOPA	status of TCR14042446693088 - TCR14042446693098
16-00119-FOPA	status of TCR1384444671984 - TCR1384444671994
16-00120-FOPA	status of TCR1384444126843 - TCR1384444126853
16-00121-FOPA	status of TCR12640071085 - TCR12640071093
16-00122-FOPA	status of TCR1384444671888 - TCR1384444671898
16-00123-FOPA	status of TCR138444439880 - TCR138444439890
16-00124-FOPA	status of TCR1384443632297 - TCR13844436323077
16-00125-FOPA	status of TCR1376655913680 - TCR1376655913690
16-00126-FOPA	status of TCR1392062486027 - TCR1392062486037

On August 31, 2016 we wrote to inform you that to continue processing your requests we needed your verification of identify or third-party authorization by September 7, 2016.¹ You sent an email later that day and wrote that the verification of identity "is not relevant to the FOIA form I filled out online." On September 8, 2016, Ms. Smith sent you an email to inform you that your requests would be closed because we did not receive the requested authorization.

¹ In that same letter we denied your requests for expedited processing and a fee waiver.

Carrie Devorah
September 13, 2016
Page 2

16-00115-FOPA through 16-00126-FOPA

You responded that same day by email and wrote that you did provide the necessary authorization and attached two documents to your email. However, those attachments were copies of our August 31, 2016 letter (to which you attached a blank copies of a verification of identity form and the online FOIA request form), and Ms. Smith's September 8, 2016 email advising you that your requests would be closed.

Given that we have not received the proper authorization, we can neither confirm nor deny the existence of any records responsive to your request. If such records were to exist, they would be exempt from disclosure pursuant to FOIA Exemptions 3, 6 and/or (7) (C), 5 U.S.C. §552(b) (3), (6) and (7) (C), 17 CFR § 200.80(b) (3), (6) and (7) (iii), for the following reasons.

Under Exemption 3, certain responsive information is specifically exempted from disclosure by statute. Pursuant to 15 USC § 78u-6, the Commission shall not disclose any information, including information provided by a whistleblower to the Commission, which could reasonably be expected to reveal the identity of a whistleblower.

Under Exemption 6 the release of this type of information would constitute a clearly unwarranted invasion of personal privacy. Under Exemption 7(C) release of such information could reasonably be expected to constitute an unwarranted invasion of personal privacy. By outlining the provisions of these exemptions, we do not mean to imply in any way that records responsive to your request exist.

You have the right to appeal my decision to the SEC's General Counsel under 5 U.S.C. § 552(a) (6), 17 CFR § 200.80(d) (5) (iv). The appeal must be received within ninety (90) calendar days of the date of this decision. Your appeal must be in writing, clearly marked "Freedom of Information Act Appeal," and should identify the requested records. The appeal may include facts and authorities you consider appropriate.

Carrie Devorah
September 13, 2016
Page 3

16-00115-FOPA through 16-00126-FOPA

You may file your appeal by completing the online Appeal form located at https://www.sec.gov/forms/request_appeal, or mail your appeal to the Office of FOIA Services of the Securities and Exchange Commission located at Station Place, 100 F Street NE, Mail Stop 2465, Washington, D.C. 20549, or deliver it to Room 1120 at that address. Also, send a copy to the SEC Office of the General Counsel, Mail Stop 9612, or deliver it to Room 1120 at the Station Place address.

If you have any questions, please contact me at smithLR@sec.gov or (202) 551-8328. You may also contact me at foiapa@sec.gov or (202) 551-7900.

You also have the right to seek assistance from me as a (202) 551-7900 as a FOIA Public Liaison, or contact the Office of Government Information Services (OGIS) for dispute resolution services. OGIS can be reached at 1-877-684-6448 or <https://ogis.archives.gov/?p=/ogis/index.html>.

Sincerely,



Lizzette Katilius
FOIA Branch Chief



Carrie Devorah <[redacted]>

The Commission Decision on Bennett

1 message

Carrie Devorah <[redacted]>
To: [redacted]
Bcc: "Keith A. Custer" <[redacted]>

Tue, May 2, 2017 at 6:06 PM

Dear Ms. Norberg

I sent this email to Jack. I am sending it to you. I am the whistleblower on this matter. Documented.

Provide me details on
1- collecting from the ALJ awarded \$4 million award
2- my whistleblower award

Restore the value of my case.

Clear my name of the Bad Faith. I read the Acts and Regs. Your agency could have done that along time ago.

Compensate me for unnecessary attempted public shaming for doing the job your agency failed at.

Ms. Norberg, 2010 to 2017, unconscionable at how an agency could screw up a case so badly countless more unsuspecting victims are harmed.

Cordially
Carrie Devorah
Public Investor 12-03894

----- Forwarded message -----
From: Carrie Devorah <[redacted]>
Date: T To: [redacted]

Jack,

Advise me how to collect
1- my portion of the ALJ decision award. I am a victim
2- my whistleblower award for cooperating with the SEC since 2010

We do need to talk about the rest- the SEC's role. And what the SEC has yet to get right. And got wrong.

Carrie Devorah
Public Investor 12-03894



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D. C. 20549

DIVISION OF
ENFORCEMENT

August 9, 2017

Emily Pasquinelli, Deputy Chief
Office of the Whistleblower
Phone: (202) 551-4790
Fax: (703) 813-9322

Ms. Carrie Devorah

[REDACTED]

**Re: Notice of Covered Action 2017-
In the Matter of Bennett Group Financial Services, LLC, et al.**

Dear Ms. Devorah:

This will confirm our receipt of your application for a whistleblower award via Form WB-APP dated [REDACTED] 27, 2017, and supporting materials, for the above-referenced matter. The Office of the Whistleblower is evaluating your claim and may contact you if we need additional information.

In the meantime, please retain this notice for future reference and keep us apprised of any change in your contact information. Of course, feel free to call, fax, or mail us any questions you may have.

Thank you for submitting this application and for your participation in the SEC's whistleblower program.

Sincerely,

Emily Pasquinelli



Carrie Devorah [REDACTED]

RE: To be added to my WB-APP dated 7-27-2017

1 message

Norberg, Jane [REDACTED]
To: Carrie Devorah [REDACTED]

Mon, Aug 21, 2017 at 1:00 PM

Ms. Devorah,

There is no document attached. Can you please resend?

Thanks,

Jane

From: Carrie Devorah [mailto:[REDACTED]]

Sent: Monday, August 21, 2017 12:04 PM

[REDACTED]

Subject: To be added to my WB-APP dated 7-27-2017

I began as an SEC WB in 2010. I continued through present date. I was going through papers where I came across Rinaldi's 2015 letter yesterday.

Please add this attached 2015 letter from Michael Rinaldi to the already filed WB-APP papers for my Whistleblower award.

Sincerely

Carrie Devorah

Public Investor 12-03894



Carrie Devorah

RESEND Of The Commission Decision on Bennett email & Resend of 2nd WB APP

1 message

Carrie Devorah

Tue, Oct 24, 2017 at 11:12 AM

My 2nd WB APP was sent in by me. The corrections you requested made are done. The email I am sending the corrected snd WB-APP affirms to the record my request(s) for compensation are in your record. In your record, too, is the agency sent no "here are your steps to follow" to file the WB-APP-timing et al.

Harvey Weinstein's NDAs are no where near as egregious as yours and that of your agency's sole approved SRO, FINRA/NASD. You are to restore my good name, my good will, to immediately remove the "Bad Faith" designation I got slapped with, a request I have made of your agency for over a year now. The Acts state the SEC can do this. You are to assure it is removed from the Internet. You are to remove the restriction I cannot share documents from this matter that I was bound to in your SRO FINRA/NASD to cover up crimes and criminals being reported to cops becoming part of public archives researchable by lawyers, Investment Clients and media.

You "adjudicated" the first WB-APP. My application was filed. My thought is knowing you are going to be working Bennett again through your ALJ Court, that let me get my application in now, so it is in the public record for BGFS, DJB, WIS, JPMCC, FINRA and all the related parties you pull away from the Courts, interfering with Justice. That is a crime, Ms. Norberg- tampering.

Bennett didn't show up to your ALJ hearing that Congress never authorized. You did nothing. Bennett pulled the same stunt in front of Greenbelt MD Magistrate Sullivan, he tossed her in jail for that and other violations. Rinaldi notated in his pleadings the SEC took no steps against Bennett for perjury to the DISB nor did the DISB report Bennett to MPDC.

That is not how the law works, Ma'am. One law for all.

I gave the SEC, FINRA information on DJB Holdings/Bennett/WIS et al 5 years before the FBI filed their case 8/2017.

Your SEC regulatory forum that has absolutely none, no, zip law enforcement authority nor authority to conduct ALJ courts. The ALJ court customizes Investment Client stolen funds in to a carved down total the SEC then feeds to the Treasury without putting the criminal in jail.

Bennett, 3-16801: \$17.6 million plus paid from Phillips Peter a cybersecurity expert with Tom Ridge's firm yet the SEC ALJ Judge orders a \$4 million fine against Bennett, that is unconscionable.

Wes Johnston, a witness in your 3-16801 case, according to Bennett's public defender is one of 3 'clients' running a firm your first pleadings state began in 2013. My documents confirm DJB Holdings began in 2007 even earlier.

Everene said you, the SEC, have no idea what I want. My answer was and remains "answers" to stop these crimes against Investment Clients the SEC and its employees are complicit to by covering crimes up through tolling statutes on the Investment Client victims and keeping away from the Courts.

The SEC as are other regulatory agencies, neutered, snipped, no power to make decisions or write policy. The Executive Office and Congress write policy and decisions. The SEC just puts the dots where Congress says to and erases the dots when Congress tells to.

The SEC WB reward payout is structured to mitigate and/or lose WB their rewards by missing deadlines (ii) to mitigate and/or lose WB rewards by alleging the monies collected did not meet the million dollar benchmark.

Bennett is a prime example of this SEC tactic. We are not on to the 2nd SEC case against Bennett. There should be cases against WIS and its execs. Bennett is not the first WIS "ICA" the SEC took action against. Then there is the case the SEC did not take against BGFS co-owner Brad Mascho or DJB exec Stuart Rogers or BGFS Foundation Tim Augustin or Dawn Bennett Group exec Kathleen Pruess, documented.

Here and now, and again moving forward without a cutoff date, this 2nd and my 1st WB APP are 'placeholders' on all actions the SEC takes against the parties I have named and those known or unknown in the sphere of BGFS, WIS, Bizub, Bennett, JPMorgan, FINRA et al. This will save me time chasing fireflies so to speak.

Greenbelt MD Judge Paula Xinis warned Bennett Defense counsel Schamel not to 'poke the bear.' I like that expression. That I was even taken in to a FINRA forum for DRS is inconceivable with what I have learned since.

You 'poked this bear' and now, the frauds against Investment Clients are being cleared up. Bennett is your gamechanger.

For the public record, the case presented by former SEC attorney Michael Rinaldi was distorted, some elements corrected in the opinion written by Brent Fields, with knowledge of Michael Piwovar.

I have stated before (i) reimburse my loss of case value I filed for, (ii) reimburse out of pockets I have incurred in the process of being your WB while your investigators and others failed their investigation (iii) reimburse the \$25,000 I was forced to pay so ordered by the FINRA arbitrators to FBI Lawyer 1.

I had no contract with Bennett Group Financial Services.

I had no contract with Western International Securities.

I signed a Clearing Agreement with JPMCC. I did not sue JPMCC.

I did not sign a "Special Submission Agreement" to go into FINRA, as I learned later is required of investment clients.

I signed a "Brokers Submission Agreement." I am not a Broker, a brokerage or an investment advisor.

I sued an investment advisor who had as I since discovered and revealed an Investment Advisor who had no clearing privileges with JPMCC.

I did not belong in FINRA. You know that as the overseeing agency appointed by Congress.

For the public record, the amount of this award in light of the data brought in since 2010 and the information emerging, continually, the award amount should be larger, not calculated case by case as the SEC does to cheat Whistleblowers speaking up at a cost.

 2017 10 23 Resend WB-APP.zip

Character matters. Your agency lacks character.

Sincerely

Carrie Devorah

Public Investor 12-03894

----- Forwarded message -----

From: Carrie Devorah <[REDACTED]>

Date: Tue, May 2, 2017 at 6:06 PM

Subject: The Commission Decision on Bennett

To: [REDACTED]

Dear Ms. Norberg

I sent this email to Jack. I am sending it to you. I am the whistleblower on this matter. Documented.

Provide me details on

- 1- collecting from the ALJ awarded \$4 million award
- 2- my whistleblower award

Restore the value of my case.

Clear my name of the Bad Faith. I read the Acts and Regs. Your agency could have done that along time ago.

Compensate me for unnecessary attempted public shaming for doing the job your agency failed at.

Ms. Norberg, 2010 to 2017, unconscionable at how an agency could screw up a case so badly countless more unsuspecting victims are harmed.

Cordially

Carrie Devorah

Public Investor 12-03894

----- Forwarded message -----

From: Carrie Devorah <[REDACTED]>

Date: T To: MCCREERYJ@sec.gov

Jack,

Advise me how to collect

- 1- my portion of the ALJ decision award. I am a victim
- 2- my whistleblower award for cooperating with the SEC since 2010

We do need to talk about the rest- the SEC's role. And what the SEC has yet to get right. And got wrong.

Carrie Devorah

Public Investor 12-03894

Whistleblower
Lawyers
&
Promoted
Whistleblower
Assistance

Whistleblower Lawyers &

Promoted Whistleblower Assistance

Whistleblower Lawyers &

Promoted Whistleblower Assistance



Carrie Devorah [redacted]

WAF

1 message

From: [redacted] <[redacted]@whistleblowersagainstfraud.com>

Sat, Apr 25, 2015 at 12:59 AM

To: [redacted]

Cc: Sarah Chase [redacted]

Hello Carrie,

I hope that this email finds you well and that you have arrived safely in NYC. It was a pleasure speaking with you and discussing your case.

I spoke with WAF CEO, Dr. Joseph Piacentile, and Chief of Staff, Sarah Chase, regarding your case and they are both available to meet with you this Saturday or Sunday after 3pm. I explained that you are looking for a "pitbull" attorney to represent you in your current lawsuit against RBC but would also be interested in a potential partnership with WAF in a whistleblowing action against RBC, FINRA and JP Morgan Chase. I attached Dr. Joe's professional and personal bio which includes a sampling of WAF's settled cases. I also attached a copy of the Common Interest Agreement that we talked about for your review. This agreement only pertains to the whistleblowing action that you are interested in partnering with WAF on. Please feel free to reach out anytime with questions or concerns you may have.

As we discussed on the phone, I agree that it will be easier to discuss your case and concerns in person. Are you able to meet with them on either day for an introductory meeting? I will let them know that you are staying in the Battery Park area while in NYC and will also copy Sarah Chase on this email for the purpose of scheduling ease. Let me know times that work best for you and a location that would be convenient or you.

Warmest Regards,
Angela Kelly Silva

Chief Fraud Analyst
WAF Asia
+66 902706335 Thailand
1-917-264-6128 New York

4 attachments

ANGELA KELLY
[redacted]@whistleblowersagainstfraud.com



WAF-Angela-email-footer.jpg
50K

This message is for the use of the intended recipient(s) only. If you are not the intended recipient you should not disseminate, distribute or take any action in reliance on the contents of this information. If you have received this email by mistake, please notify the sender immediately by e-mail. You should not disseminate, distribute or take any action in reliance on the contents of this information. If you are not the intended recipient you should not disseminate, distribute or take any action in reliance on the contents of this information.

Joseph Piacentile, M.D. WAF Bio 2015.pdf
2520K

Dr. Joe Bio and Piacentile Family Foundation 3.26.15.pdf
1853K

CIA- Carrie Devorah.pdf
560K

BRACH | EICHLER_{LLC}

Anthony M. Rainone
Direct Dial: 973-364-8372
Direct Fax: 973-618-5972
E-mail: [REDACTED]

June 20, 2015

VIA E-MAIL (CARRIEDEV@GMAIL.COM)

Carrie Devorah

Re: Whistleblowers Against Fraud v. Kelly

Dear Ms. Devorah:

I am an attorney representing Whistleblowers Against Fraud, LLC (“WAF”). You are receiving this letter because WAF has identified you or your company as an interested party to the information set forth herein.

As you may be aware, WAF recently terminated one of its investigators based in Thailand, Angela Nkrasu Kelly a/k/a Angela Kelly-Silva. After her termination, Ms. Kelly engaged in a series of acts that WAF believed violated her restrictive covenant agreement and New Jersey law including, but not limited to, contacting and soliciting several of WAF’s clients, prospective clients, and business relations, as well as making disparaging remarks about WAF. The disparaging comments included wrongly claiming to WAF clients that the Common Interest Agreements between WAF and the clients are legally unenforceable.

WAF wrote to Ms. Kelly demanding that she cease her unlawful activities but she refused to do so and, in fact, escalated her campaign thereafter. As a result, WAF commenced a civil lawsuit against Ms. Kelly on June 4, 2015 in the Superior Court of New Jersey, Bergen County, Chancery Division, bearing the caption *Whistleblowers Against Fraud, LLC v. Kelly*, Docket No. BER-C-166-15 (“Lawsuit”). WAF is seeking money damages against Ms. Kelly as well as injunctive relief barring her from engaging in any activities that violate her restrictive covenants, her consulting agreement in general, or New Jersey law.

As part of that Lawsuit, WAF requested from the Court an immediate temporary restraining order (“TRO”) barring Ms. Kelly from engaging in the allegedly unlawful activities during the pendency of the Lawsuit. On June 8, 2015, the Court found that WAF’s claims against Ms. Kelly are likely to succeed and that her activities are likely to cause WAF irreparable harm if the Court did not intervene immediately. The Court therefore entered the enclosed TRO

Anthony M. Rainone
New Jersey State Bar Association
Member No. 100000000

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Anthony M. Rainone
New Jersey State Bar Association
Member No. 100000000

Carrie Devorah
June 20, 2015
Page 2

barring Ms. Kelly from continuing to engage in her unlawful activities. Ms. Kelly is currently restrained by the Court's Order from, among other things:

- Soliciting, diverting, or attempting to solicit or divert, alone or in concert with others, any clients or prospective clients of WAF who were clients or prospective clients of WAF from October 1, 2014 through May 31, 2015.
- Making any disparaging or negative remarks about WAF or its affiliates, officers, or executives to any person or entity.
- Destroying any of WAF's proprietary information.

WAF is providing you this information and a copy of the enclosed TRO to ensure that you receive accurate and truthful information regarding this matter. WAF encourages you to contact it directly if you have any questions about this matter and it looks forward to continuing to work with you in the future. Mr. Stephen Gretz, CFO of WAF (201-788-1377/sdg@whistleblowersagainstfraud.com) is available at your convenience to answer any questions you may have.

Very truly yours,



Anthony M. Rainone

AMR/jps
Enclosure

cc: Whistleblowers Against Fraud, LLC (via email)

Carrie Devorah 

Follow up from Whistleblowers Against Fraud

1 message

Steve Gretz <sdg@whistleblowersagainstfraud.com>

Mon, Jun 8, 2015 at 12:44 PM

To: 

Hi Carrie, my name is Steve Gretz and I work for WAF. I apologize for the break in communication - Angie is no longer with us and we're still working on reassigning her cases and leads.

I'd love to hear how things are going and whether your case survived the motion to dismiss.

We're quite interested in looking at the possibility of a qui tam case with you - let me know when you're available for a call about that.

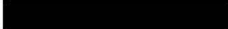
Thanks!

Steve Gretz

-

STEPHEN GRETZ

sdg@whistleblowersagainstfraud.com

MOBILE: 

FAX: 201-829-0840

**WHISTLEBLOWERS**
AGAINST FRAUD

This message is for the use of the intended recipient only. It is from a legal services company and may contain information that is privileged and confidential. If you are not the intended recipient any disclosure, copying, future distribution, or use of this communication is prohibited. If you have received this communication in error, please advise us by return e-mail, or if you have received this communication by fax advise us by telephone and delete/destroy the document.

FILED

JUN - 8 2015

Robert P. Contillo
P.J.Ch.

Anthony M. Rainone, Esq. (Bar No. 024132003)

Lucas Markowitz, Esq. (Bar No. 023802011)

BRACH EICHLER L.L.C.

101 Eisenhower Parkway

Roseland, New Jersey 07068-1067

(973) 228-5700

- and -

Jonathan Pickhardt, Esq. (*pro hac vice motion to be filed*)

QUINN EMANUEL URQUHART & SULLIVAN, LLP

51 Madison Avenue, 22nd Floor

New York, NY 10010

(212) 849-7000

Attorneys for Plaintiff

Whistleblowers Against Fraud, LLC

WHISTLEBLOWERS AGAINST
FRAUD, LLC,

Plaintiffs,

vs.

ANGELA NKRASU KELLY a/k/a
Angela Kelly-Silva,

Defendant.

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION: BERGEN COUNTY

DOCKET NO.:

01-166-15

Civil Action

**ORDER TO SHOW CAUSE
WITH TEMPORARY RESTRAINTS AND
SPECIAL APPOINTMENT FOR SERVICE OF
PROCESS IN THE COUNTY OF THAILAND**

THIS MATTER being brought before the court by Anthony M. Rainone, Esq. of Brach Eichler, LLC, attorney for Plaintiff Whistleblowers Against Fraud, LLC, seeking relief by way of temporary restraints pursuant to R. 4:52, based upon the facts set forth in the Verified Complaint filed herewith; and for a special appointment for service of process in the Country of Thailand pursuant to R. 4:4-4(b)(1)(B)

based upon the Affidavit of Diligent Inquiry filed herewith; and it appearing that Defendant Angela Nkrasu Kelly a/k/a Angela Kelly Silva has notice of this application and for good cause shown.

It is on this 8th day of June, 2015

ORDERED that Defendant Angela Nkrasu Kelly appear and show cause before the Superior Court at the Bergen County Courthouse in Hackensack, New Jersey at 9 o'clock in the fore noon or as soon thereafter as counsel can be heard, on the 10th day of July, 2015 why an order should not be issued:

- A. Preliminarily enjoining and restraining Defendant from, during the pendency of the lawsuit, soliciting, diverting or attempting to solicit or divert, alone or in concert with others, any clients or prospective clients of Plaintiff who were clients or prospective clients of Plaintiff from October 1, 2014 through May 31, 2015;
- B. Preliminarily enjoining and restraining Defendant from, during the pendency of this lawsuit, making any disparaging or negative remarks about Plaintiff or its affiliates, officers or executives to any person or entity;
- C. Compelling Defendant to identify and turn over any of Plaintiff's "Proprietary Information," as that terms is defined and described in the Verified Complaint, in whatever form Defendant possesses the Proprietary Information (*i.e.*, electronically, paper/hard copy, or otherwise) and to prohibit Defendant from using or relying upon the Proprietary Information in any manner whatsoever;
- D. Compelling Defendant to identify and turn over for a computer forensic inspection all personal electronic devices including but not limited to, desktop computers, laptop computers, tablets, smart phones, iPhones, Android devices, PDAs, hard drives, thumb/flash drives that Defendant has used, owned, or possessed from October 1, 2014 to the present date, in order to recover from

Defendant all of Plaintiff's proprietary information;

- E. Compelling Defendant to identify and turn over her login and password credentials for any and all remote/cloud based electronic storage platforms that she has used, owned, or accessed from October 1, 2014 to the present date; and
- F. Granting such other relief as the court deems equitable and just.

And it is further *ORDERED* that pending the return date herein, Defendant is temporarily enjoined and restrained from:

- A. Soliciting, diverting or attempting to solicit or divert, alone or in concert with others, any clients or prospective clients of Plaintiff who were clients or prospective clients of Plaintiff from October 1, 2014 through May 31, 2015;
- B. Making any disparaging or negative remarks about Plaintiff or its affiliates, officers or executives to any person or entity;
- C. Moving, copying, altering, modifying, deleting, or destroying, any of Plaintiff's "Proprietary Information," as that terms is defined and described in the Verified Complaint, in whatever form Defendant possesses the Proprietary Information (*i.e.*, electronically, paper/hard copy, or otherwise) and further prohibited from using or relying upon the Proprietary Information in any manner whatsoever;
- D. Moving, disposing, transferring, selling, altering, modifying, wiping, or otherwise altering all personal electronic devices including but not limited to, desktop computers, laptop computers, tablets, smart phones, iPhones, Android devices, PDAs, hard drives, thumb/flash drives that Defendant has used, owned, or possessed from October 1, 2014 to the present date; and
- E. Moving, disposing, transferring, selling, altering, modifying, wiping, or otherwise altering the

contents of any of remote/cloud based electronic storage platforms that Defendant has used, owned, or accessed from October 1, 2014 to the present date.

And it is further *ORDERED* that:

1. The defendant may move to dissolve or modify the temporary restraints herein contained on two (2) days notice to the Plaintiff's attorney, Anthony M. Rainone, Esq. of Brach Eichler, LLC.
2. A copy of this order to show cause, Verified Complaint, legal memorandum and any supporting affidavits or certifications submitted in support of this application be served upon the Defendant by personal service by a representative of Process Service Network, LLC, who by this Order to Show Cause is specially appointed by the Court to serve this process personally on Defendant in the country of Thailand, in addition to service by mail by any recognized international delivery service such as Federal Express or United Parcel Service, to Defendant's dwelling house or usual place of abode, in addition to Plaintiff emailing Defendant a copy of these papers to her personal "gmail" email address, within ~~7~~ days of the date hereof, in accordance with *R.* 4:4-3 and *R.* 4:4-4, this being original process.
3. The Plaintiff must file with the court his/her/its proof of service of the pleadings on the Defendant no later than ~~three (3)~~ days before the return date.
4. Defendant shall file and serve a written response to this order to show cause and the request for entry of injunctive relief and proof of service by ~~7~~, 2015. The original documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptvclerklawref.pdf.

Defendant take notice that you must send a copy of your opposition papers directly to Judge Centillo, whose address is Room 421, 10 Main Street, Hackensack, New

Jersey. You must also send a copy of your opposition papers to Plaintiff's attorney, Anthony M. Rainone, Esq. of Brach Eichler, LLC.. A telephone call will not protect your rights; you must file your opposition and pay the required fee of \$ * and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the Plaintiff is seeking.

5. The Plaintiff must file and serve any written reply to the Defendant's order to show cause opposition by * 2015. The reply papers must be filed with the Clerk of the Superior Court in the county listed above and a copy of the reply papers must be sent directly to the chambers of Judge Contillo .

6. If the Defendant does not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that the Plaintiff files a proof of service and a proposed form of order at least three days prior to the return date.

7. If the Plaintiff has not already done so, a proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than three (3) days before the return date.

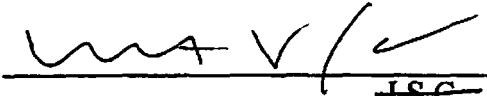
8. Defendant take notice that the Plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The Verified Complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service within 35 days from the date of service of this order to show cause; not counting the day you received it.

These documents must be filed with the Clerk of the Superior Court in the county listed above. A directory of these offices is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf. Include a \$ *

filing fee payable to the "Treasurer State of New Jersey." You must also send a copy of your Answer to Plaintiff's attorney, Anthony M. Rainone, Esq. of Brach Eichler. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the order to show cause is not an Answer and you must file both. Please note further: if you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief plaintiff demands.

9. Defendant further take notice that if you cannot afford an attorney, you may call the Legal Services office in the county in which you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJLAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

10. The court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court and parties are advised to the contrary no later than * days before the return date.



J.S.C.

ROBERT P. CONTILLO, P.J.Ch.

* see attached rider

CASE NAME: Whistleblowers Against Fraud v. Kelly
DOCKET NUMBER: C-166-15

SUPPLEMENTAL PROVISIONS TO ORDER TO SHOW CAUSE

RETURNABLE: Friday July 10, 2015 at 9:00 a.m.

SERVICE OF PLEADINGS

A copy of this order to show cause, verified complaint, legal memorandum and any supporting affidavits or certifications submitted in support of this application shall be served upon the defendant personally within 5 working days of the date hereof, in accordance with R. 4:4-3 and R. 4:4-4, this being original process.

PROOF OF SERVICE

The plaintiff must file with the court his/her/its proof of service of the pleadings on the defendant no later than five (5) days before the return date.

DEFENDANT'S OSC/INJUNCTIVE RELIEF RESPONSE REQUIREMENTS

Defendant shall file and serve a written response to this order to show cause and the request for entry of injunctive relief and proof of service by June 25, 2015. Such response shall not exceed 15 pages in length. If these papers contain exhibits, the exhibits must be properly indexed using tabs that allow for easy access to each individual exhibit. The original documents must be filed with the clerk of the Superior Court, Room 418. You must send a copy of your opposition papers directly to Judge Robert P. Contillo, whose address is Room 420, Courthouse, Hackensack, New Jersey. You must also send a copy of your opposition papers to the plaintiff's attorney whose name and address appears at the top of these papers, or to the plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file your opposition and pay the required fee and serve your opposition on your adversary, if you want the court to hear your opposition to the injunctive relief the plaintiff is seeking. NOTE: These papers are not the Answer to plaintiff's complaint, which must be filed within 35 days (see below).

PLAINTIFF'S REPLY RESPONSIBILITY

The plaintiff must file and serve any written reply to the defendant's order to show cause opposition by July 2, 2015. Such response shall not exceed 10 pages in length. If these papers contain exhibits, the exhibits must be properly indexed using tabs that allow for easy access to each individual exhibit. The reply papers must be filed with the Clerk of the Superior Court and a copy of the reply papers must be sent directly to the chambers of Judge Contillo.

OSC MAY PROCEED EX-PARTE

If the defendant does not file and serve opposition to this order to show cause, the application will be decided on the papers on the return date and relief may be granted by default, provided that the plaintiff files a proof of service and a proposed form of order at least three days prior to the return day.

PREHEARING SUBMISSION FORM OF ORDER/JUDGMENT

If the defendant has not already done so, a proposed form of order addressing the relief sought on the return day (along with a self-addressed return envelope with return address and postage) must be submitted to the court no later than 3 days before the return day.

NOTICE TO DEFENDANT - LAWSUIT ANSWER RESPONSIBILITY

Defendant, take notice that the plaintiff has filed a lawsuit against you in the Superior Court of New Jersey. The verified complaint attached to this order to show cause states the basis of the lawsuit. If you dispute this complaint, you, or your attorney, must file a written answer to the complaint and proof of service within 35 days from the day of service of this order to show cause; not counting the day you received it. These documents must be filed with the Clerk of the Superior Court. Include the filing fee, payable to the "Treasurer, State of New Jersey." You must also send a copy of your Answer to the plaintiff's attorney whose name and address appear on these papers, or to the plaintiff, if no attorney is named. A telephone call will not protect your rights; you must file and serve your Answer (with the fee) or judgment may be entered against you by default. Please note: Opposition to the order to show cause is not an Answer and you must file both. Please note further: If you do not file and serve an Answer within 35 days of this Order, the Court may enter a default against you for the relief plaintiff demands.

LEGAL SERVICES NOTICE

If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. If you do not have an attorney and are not eligible for free legal assistance you may obtain a referral to an attorney by calling one of the Lawyer Referral Services.

RETURN DAY TESTIMONY

The Court will entertain argument, but not testimony, on the return day of the order to show cause, unless the court and parties are advised to the contrary no later than 3 days before the return day.



Hon. Robert P. Contillo P.J.Ch.



Carrie Devorah <[redacted]>

Whistleblowers Against Fraud v. Kelly

1 message

Rainone, Anthony <[redacted]>
To: [redacted]

Sat, Jun 20, 2015 at 7:33 PM

Dear Ms. Devorah:

Please see attached letter on behalf of my client, Whistleblowers Against Fraud, LLC. If you have any questions, please feel free to contact me.

Anthony M. Rainone, Esq.
BRACH EICHLER
101 Eisenhower Parkway | Roseland, New Jersey 07068
Direct: [redacted] | Firm: 973-228-5700 | Fax: 973-618-5972
bio | email | vcard | website
New York City | Roseland | Palm Beach

Please visit our Employment Services Blog

This email is from Brach Eichler LLC, a law firm, and may contain information that is confidential or privileged. If you are not the intended recipient, do not read, copy or distribute this e-mail or any attachments. Instead, please notify the sender and delete this e-mail and any attachments.

2 attachments

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2015.06.20 Ltr to Devorah with TRO.PDF
461K

*This explains the
Wall Street pushback on
the D.O.L.*

**DOL.:
EMPLOYEE
INDEPENDENT
CONTRACTOR**

**BROKER AGREEMENT
Schedule A**

Independent Contractor is not an employee

This agreement between Bennett Financial Group ("Broker") and Western International Securities, Inc. ("Western") is dated July 24 2009. This agreement is to be used in conjunction with the Independent Contractor Agreement (ICA) and is designed to encompass specific payout and expense issues not addressed in that Agreement. Bennett Financial Group will be bound by the terms of the ICA with regard to regulatory requirements and responsibility for errors and losses attributed to her business.

Payout

The payout on all brokerage, management and advisory business (regardless of whose RIA is used) will be 92% based on maintaining two million per year in overall production.

Ticket Charges

All J.P. Morgan (or other clearing broker-dealer) fees will be passed on to Broker for brokerage business. For advisory business the fee can be passed on to the customer. The most common ticket charges by J.P. Morgan are as follows:

- Stocks \$15.95 per ticket.
- Bonds \$19.95 per ticket
- Options \$15.95 per ticket plus \$1.50 per contract

Mutual funds are no charge if done directly with the fund or within a JP Morgan Fund Circuit account. Funds done over the wire will be charged \$11 per ticket, \$7.50 for mutual fund exchanges. The vast majority of our listed business is executed third market and that is the default for MORCOM Order Entry System. If you direct a trade to a listed exchange or get special handling from a JP Morgan trading desk, there may be additional execution fees. There may also be per share fees to execute on certain algorithm trading systems. Customers will pay a \$4.75 service fee.

Registration and fees

- Western will pay for the cost to transfer Bennett Financial Group series 7 and up to four state license fees. Bennett Financial Group will be responsible for all renewal fees. Western adds a \$15 per state processing fee to each state registration. Bennett Financial Group will also be responsible for Western's annual association fee beginning in summer 2010. The association fee covers the firm's Fidelity bond and the cost of registration in all of the states and runs approximately \$490 per year.
- Errors and omissions insurance is obtained by Western, and is mandatory for all independent contractors who hold a series 6 or 7 regardless of production. The amount will be determined annually based on the premium and is currently

000000725

\$2,299.62 per year and our policy renews in March, Bennett Financial Group will pay a prorated portion monthly until renewal.

- Any further expenses of operating your office will be billed to and paid by you. Western will offer JP Morgan access for \$60 a terminal. Western will provide a mandatory NASD/SEC compliant email address and instant messenger service for \$25 a month per address. There may be additional charges to use a custom domain.

There is an annual office compliance inspection and it will be provided by Western at a cost of \$595.

Western will charge back all fees versus Bennett Financial's monthly production. If the production does not cover the fees, Western will allow Bennett Financial to carry a debit. If the debit exceeds \$1000, the entire amount must become current in 45 days.

Transition Support

Western will provide transition support money based on the following schedule:

- \$125k upon receiving the first 100 ACAT forms
- \$100k ninety days after arrival (to be paid by JP Morgan)
- \$25k when \$1.5 million in gdc is reached (must occur within the first 14 months)
- \$150k when \$3 million in gdc is reached (must occur within the first 14 months)
- \$25k when \$4 million in gdc is reached (must occur within the first 14 months)
- \$25k when \$5 million in gdc is reached (must occur within the first 14 months)
- \$25k when \$6 million in gdc is reached (must occur within the first 14 months)
- \$25k when \$7 million in gdc is reached (must occur within the first 14 months)

This money will be the only contribution Western will make to cover transition expenses, including but not limited to: ACAT fees, repapering, postage, IRA termination, and check writing fees.

Media

To the extent compliant with rules and regulations of FINRA, the SEC and other applicable regulatory authorities, Broker may make personal and promotional appearances without pre-approving content, including but not limited to television and radio appearances, print interviews, internet commentary and web pages. Any advertising will be pre-approved before use and any non-advertising material used later as advertising, i.e., TV appearances and print interviews, which do not meet the compliance standards, will be withdrawn from use immediately upon notice.

Advertising materials and compliance submissions

Evaluation and adjudication of Broker compliance submissions will generally be completed within 24 hours of submission.

International accounts

To the extent compliant with rules and regulations of FINRA, the SEC, other applicable regulatory authorities, and J.P. Morgan (or other clearing firms Western may use in its discretion), Broker will be supported in opening customer accounts and transacting business through offices, partners and affiliates in international locations. Broker intends to market, serve clients and sell product from these offices in compliance with all applicable regulatory authorities. Broker understands that international business may trigger additional compliance oversight by Western or Western's clearing firm, in order to comply with applicable law, including anti-money laundering compliance under the US Patriot Act. Western and its clearing broker reserve the right to close or restrict any accounts as may be deemed necessary in their discretion to comply with applicable law. It is understood that to the degree international expansion increases Western's cost structure (e.g., if the creation of such offices requires extraordinary compliance oversight by Western or its clearing firm) Broker agrees to bear such costs.

Regulatory interaction

Broker reserves the right to appeal to the appropriate regulatory authority in any questions arising from compliance submissions. Broker shall first submit to Western any such communications Broker intends to submit to a regulatory authority.

Product development

Broker reserves the right to create investment products that are licensed and sold domestically and internationally by other financial institutions and insurance companies, provided that Broker fully complies with FINRA Rules 3030 and 3040, Western's compliance requirements and other applicable regulatory authority. It is understood that to the degree these product expansions impact the Western's cost structure (e.g., if extraordinary compliance oversight is necessary), Broker agrees to bear such costs.

Other

Western respects a Broker's right to transfer his/her customers if he/she chooses and Western will facilitate a negative transfer with a sixty day notice. Western will not interfere with the transfer of Bennett Financial Group's clients to a new firm and will not solicit them. The terms of your Schedule A are confidential and not to be shared with others.

WESTERN INTERNATIONAL SECURITIES, INC.


Donald M. Bizub, CEO

Bennett Financial Group

8-6-9
Date

7/27/09
Date


00000727

Individual 1567051 - BENNETT, DAWN

Reportable Events

Regulatory Action **DRP** DRP Version 05/2009

2009 and 2011.

Critically, despite over four years of investigation, the SEC did not charge that customers of BGFS lost money due to any misconduct on the part of Ms. Bennett or BGFS.

Ms. Bennett and her colleagues at BGFS have acted with integrity in building their company. Their business model is based on the integrity of the markets and the need for financial advisors to abide by conduct consistent with just and equitable principles of trade. Litigation will demonstrate that the SEC's allegations against Bennett and her firm are without merit.

Consequently, Ms. Bennett denies all allegations of any wrongdoing. She will vigorously defend this case at the earliest possible moment, but in the proper forum. When all facts come to light, not just those the SEC chooses to focus on, Ms. Bennett anticipates she will be completely vindicated.

Filing ID 46129599 Form (Form Version) U6 (05/2009)
Filing Date 03/31/2017
Source United States Securities and Exchange Commission
Disclosure Questions Answered

Regulatory Action **DRP** DRP Version 05/2009

1. Regulatory Action initiated by:

- A. Initiated by: Securities and Exchange Commission
- B. Full name of regulator: UNITED STATES SECURITIES AND EXCHANGE COMMISSION

2. Sanction(s) sought: Other: n/a

3. Date initiated/Explanation: 09/09/2015

4. Docket/Case#: 3-16801

5. Employing firm: Bennett Group Financial Services, LLC

6. Product type(s): No Product

7. Allegation(s): SEC Admin Release 33-9910/34-75864/IA Release 4191/Investment Company Act Release 31810/September 9, 2015: The Securities and Exchange Commission (Commission) deems it appropriate and in the public interest that public administrative and cease-and-desist proceedings be, and hereby are, instituted pursuant to Section 8A of the Securities Act of 1933 (Securities Act), Sections 15(b) and 21C of the Securities Exchange Act of 1934 (Exchange Act), Sections 203(e), 203(f), and 203(k) of the Investment Advisers Act of 1940 (Advisers Act), and Section 9(b) of the Investment Company Act of 1940 (Investment Company Act) against Dawn J. Bennett. From at least 2009 through February 2011, a firm and its founder, majority owner, and CEO, Bennett, made material misstatements and omissions regarding assets that were purportedly "managed" for investors and regarding investment returns for the purpose of retaining existing customers and attracting new customers.

employee is not an independent contractor.

Individual 1567051 - BENNETT, DAWN

Reportable Events

Regulatory Action DRP

DRP Version 05/2009

Then, during the investigation of this matter, Bennett and the firm made additional misstatements in an effort to obstruct the investigation and to "cover up" their prior fraud. In short, Bennett and the firm grossly overstated the amount of assets they "managed," by at least \$1.5 billion, in a calculated effort to inflate their profile and prestige. They made the false and fraudulent claims to a national financial advisor ranking service knowing that the ranking service would publish the misstatements. They also made the misstatements on a Washington, D.C.-area radio program hosted by Bennett, and in a variety of other advertisements and communications with existing and prospective customers and clients. The purpose of these overstatements was to create the impression that Bennett and her firm were larger and more successful players in the industry than they were. Bennett and the firm also made material misstatements and omissions during the radio show regarding the firm's investment returns and performance. Bennett frequently touted her firm's highly profitable investment returns and claimed that those returns placed the firm in the "top 1%" of firms worldwide. In violation of her legal disclosure duties and specific advice she received, Bennett failed to disclose that the purported "returns" were simply those of a "model portfolio" and did not reflect actual customer returns. In addition to the material misstatements and omissions about these matters, Bennett and the firm failed to adopt and to implement adequate written policies and procedures related to the calculation and advertisement of assets managed and of investment returns. During the investigation of this matter, in order to substantiate their prior fraudulent claims regarding assets managed and to obstruct this investigation, Bennett and the firm made additional false statements. They falsely asserted that they gave advice regarding short-term cash management to three corporate clients regarding over \$1.5 billion in corporate assets. In reality, they never provided the advice, and these were simply lies meant to deceive the Division of Enforcement. Bennett and the firm never provided any form of management for assets in excess of approximately \$407 million. As a result of the conduct described above, Bennett willfully violated Section 17(a) of the Securities Act and Section 10(b) of the Exchange Act and Rule 10b-5 thereunder and Sections 206(1) and 206(2) of the Advisers Act. Bennett willfully aided and abetted and caused the firm's violations of, Section 206(4) of the Advisers Act and Rules 206(4)-1(a)(5) and 206(4)-7 thereunder.

8. Current status: Final
9. Limitations or restrictions while pending: No
10. If on appeal:
- A. Appealed to:
- B. Date appealed/Explanation:
- C. Limitations or restrictions while on appeal:
11. Resolution details:
- A. Resolution detail: Order

Individual 1567051 - BENNETT, DAWN

Reportable Events

Regulatory Action DRP

DRP Version 05/2009

- B. Full name of regulator: UNITED STATES SECURITIES AND EXCHANGE COMMISSION
- 2. Sanction(s) sought: Other: N/A
- 3. Date initiated/Explanation: 09/09/2015
- 4. Docket/Case#: 3-16801
- 5. Employing firm: BENNETT GROUP FINANCIAL SERVICES, LLC
- 6. Product type(s): No Product
- 7. Allegation(s): OVERSTATED FIRM'S ASSETS UNDER MANAGEMENT AND INVESTMENT RETURNS
- 8. Current status: Pending
- 9. Limitations or restrictions while pending: No
- 10. If on appeal:
 - A. Appealed to:
 - B. Date appealed/Explanation:
 - C. Limitations or restrictions while on appeal:
- 11. Resolution details:
 - A. Resolution detail:
 - B. Resolution date/Explanation:
- 12. Final order:
- 13. Sanction detail:
 - A. Sanctions ordered:
 - B. Other sanctions:
 - C. Sanction type details:
 - D. Requalification type details:
 - E. Monetary related sanction type details:

- 14. Comment: Bennett Group Financial Services ("BGFS") and Dawn Bennett, despite facts to the contrary, were recently charged by the SEC with misrepresenting the amount of "assets under management" and the results of their investment model used to make recommendations to their brokerage clients. The reputed misstatements are said to have occurred almost five years ago in statements made on Ms. Bennett's syndicated radio show, "Financial Mythbusting," in which Ms. Bennett and her guests debate government economic policies, and in a publication in

Individual 1567051 - BENNETT, DAWN

Reportable Events

SRO Arbitration/Reparation DRP

DRP Version 05/2009

- 1. Case name: Steven Santagati vs. Western International Securities, Inc., Dawn Bennett, Bennett Group Financial Services, LLC
- 2. Arbitration/Reparation filed with: FINRA
- 3. Date initiated: 02/21/2014
- 4. Docket/Case#: 14-00575
- 5. Employing firm: Western International Securities, Inc.
- 6. Allegation(s): breach of the general duties of reasonable care, honesty and disclosure; recommending unsuitable investments in violation of Fla. Stat. Section 517.301; common law fraud; breach of fiduciary duty; negligence
- 7. Product type: Other: exchange traded fund
- 8. Alleged compensatory damage amount: \$850,000.00
- 9. Currently pending resolution: No
- 10. Resolution details:
 - A. Resolution: Award
 - B. Resolution date: 03/21/2017
 - C. Disposition details: Bennett is jointly and severally liable for violations of Fla. Stat Section 517.301 including, but not limited to, recommending unsuitable investments and shall pay to Claimant the sum of \$763,740 in compensatory damages. Bennett is also jointly and severally liable for and shall pay to Claimant interest on the above-stated sum at the Florida statutory rate from the date of the Award until it is paid in full.
- 11. Comment:

Occurrence#	1768131	Disclosure Type	Customer Complaint
FINRA Public Disclosable	Yes	Reportable	Yes
Material Difference in Disclosure	No		
Filing ID	38910895	Form (Form Version)	U4 (05/2009)
Filing Date	04/24/2015		
Source	39262 - WESTERN INTERNATIONAL SECURITIES, INC.		
Disclosure Questions Answered	14I(1)(a)		

Customer Complaint DRP

DRP Version 05/2009

- 1. Customer name(s): CATHERINE E. BOLAND AND RICHARD C. GRAVES
- 2. Residence information:
 - A. Customer(s) state of residence: Maryland
 - B. Other state(s) of residence/ detail:

Individual 1567051 - BENNETT, DAWN

Reportable Events

Customer Complaint DRP

DRP Version 05/2009

A. Customer(s) state of residence: Florida

B. Other state(s) of residence/ detail:

3. Employing firm:

WESTERN INTERNATIONAL SECURITIES, INC.

4. Allegation(s):

DESPITE HIS APPROVAL FOR ALL TRANSACTIONS, CLAIMANT ALLEGED THAT CERTAIN TRANSACTIONS VIOLATED A BREACH OF DUTY, AND NEGLIGENCE IN HIS ACCOUNT DURING THE PERIOD MAY 2010 THROUGH NOVEMBER 2013. THE RECORDS REFLECT THE CUSTOMER AUTHORIZED THE TRANSACTIONS. THE ALLEGATIONS ARE WITHOUT MERIT AND DENY THE ALLEGATIONS.

5. Product type(s):

Debt-Government
Equity Listed (Common & Preferred Stock)

6. Alleged compensatory damage amount: \$850,000.00

Explanation:

7. Customer complaints:

A. Oral complaint:

B. Written complaint:

C. Arbitration/CFTC reparation or civil litigation:

i. Arbitration/Reparation forum
court name/location:

ii. Docket/Case#:

iii. Arbitration or civil litigation filing date:

D. Date received by/Served on
firm/Explanation:

8. Complaint, arbitration/CFTC reparation, civil litigation pending:

9. Complaint, arbitration/CFTC reparation or civil status:

10. Status date/Explanation:

11. Settlement/Award/Monetary judgment:

A. Award amount:

B. Contribution amount:

12. Arbitration/CFTC reparation information:

A. Arbitration/CFTC reparation claim
filed with: FINRA

Individual 1567051 - BENNETT, DAWN

Reportable Events

Filing ID 36629720 Form (Form Version) U6 (05/2009)
Filing Date 05/09/2014
Source FINRA
Disclosure Questions Answered

SRO Arbitration/Reparation DRP DRP Version 05/2009

1. Case name: JOHN D. CROWLEY AND LAMIA A, CROWLEY VS. WESTERN INTERNATIONAL SECURITIES, INC., AND DAWN BENNETT
2. Arbitration/Reparation filed with: FINRA
3. Date initiated: 02/13/2013
4. Docket/Case#: 13-00467
5. Employing firm: WESTERN INTERNATIONAL SECURITIES, INC.,
6. Allegation(s): BREACH OF CONTRACT; NEGLIGENCE; BREACH OF FIDUCIARY DUTY; CHURNING; UNAUTHORIZED TRADING; MISREPRESENTATIONS AND OMISSIONS AND UNSUITABILITY.
7. Product type: Other: EXCHANGE TRADED FUNDS AND FIXED INCOME PRODUCT
8. Alleged compensatory damage amount: \$1,935,230.00
9. Currently pending resolution: No
10. Resolution details:
- A. Resolution: Award
- B. Resolution date: 05/06/2014
- C. Disposition details: RESPONDENT IS FOUND JOINTLY AND SEVERALLY LIABLE AND SHALL PAY TO CLAIMANTS COMPENSATORY DAMAGES IN THE AMOUNT OF \$150,000.00, PLUS COMPOUND INTEREST
11. Comment:

Occurrence#	1652718	Disclosure Type	Customer Complaint
FINRA Public Disclosable	Yes	Reportable	Yes
Material Difference in Disclosure	No		

Filing ID 37698214 Form (Form Version) U4 (05/2009)
Filing Date 10/31/2014
Source 39262 - WESTERN INTERNATIONAL SECURITIES, INC.
Disclosure Questions Answered 14I(1)(b)

Customer Complaint DRP DRP Version 05/2009

1. Customer name(s): KERRY EDWARDS
2. Residence information:
- A. Customer(s) state of residence: Virginia

Individual 1567051 - BENNETT, DAWN

Administrative Information

Composite Information

Full Legal Name BENNETT, DAWN
 State of Residence MD
 Active Employments <<No Current Active Employments found for this Individual.>>
 Reportable Disclosures? Yes
 Statutory Disqualification? SDRQRSRVW
 Registered With Multiple Firms? No
 Material Difference in Disclosure? No

Registrations with Current Employer(s)

<<No Registrations with Current Employer(s) found for this Individual.>>

Registrations with Previous Employer(s)

From 10/01/2009 To 11/24/2015 WESTERN INTERNATIONAL SECURITIES, INC.(39262)

Reason for Termination Permitted to Resign

Termination Comment Firm decision following discovery of promissory notes with Firm customers by registered representative's company.

Regulator	Registration Category	Status Date	Registration Status	Approval Date
CT	AG	11/25/2015	TERMED	10/01/2009
FINRA	GS	12/01/2015	TERMED	10/01/2009

From 10/16/2006 To 09/06/2013 BENNETT GROUP FINANCIAL SERVICES, LLC(145989)

Reason for Termination

Termination Comment

<<No Registrations with Previous Employer(s) found for this Individual.>>

From 02/16/2006 To 10/05/2009 ROYAL ALLIANCE ASSOCIATES, INC.(23131)

Reason for Termination Voluntary

Termination Comment

Regulator	Registration Category	Status Date	Registration Status	Approval Date
CT	AG	10/07/2009	TERMED	02/16/2006
FINRA	GP	10/07/2009	T_NOREG	
FINRA	GP	10/07/2009	T_NOREG	
FINRA	GP	10/07/2009	T_NOREG	
FINRA	GP	10/07/2009	T_NOREG	
FINRA	GS	10/07/2009	TERMED	02/16/2006
FINRA	MP	10/07/2009	T_NOREG	

From 02/21/2006 To 02/21/2006 CITIGROUP GLOBAL MARKETS INC.(7059)

Reason for Termination Voluntary

Termination Comment

Regulator	Registration Category	Status Date	Registration Status	Approval Date
CBOE	GS	02/24/2006	TERMED	02/21/2006
NYSE-ARCA	GS	02/24/2006	TERMED	02/21/2006

Individual 1567051 - BENNETT, DAWN

Reportable Events

SRO Arbitration/Reparation DRP

DRP Version 10/2005

ACTUAL/COMPENSATORY DAMAGES, RELIEF REQUEST IS WITHDRAWN/SETTLED/ETC, AWARD AMOUNT JOINTLY AND SEVERALLY;
ACTUAL/COMPENSATORY DAMAGES, RELIEF REQUEST IS WITHDRAWN/SETTLED/ETC, AWARD AMOUNT JOINTLY AND SEVERALLY;
ACTUAL/COMPENSATORY DAMAGES, RELIEF REQUEST IS WITHDRAWN/SETTLED/ETC, AWARD AMOUNT JOINTLY AND SEVERALLY;
INTEREST, RELIEF REQUEST IS WITHDRAWN/SETTLED/ETC, AWARD AMOUNT JOINTLY AND SEVERALLY; OTHER COSTS, RELIEF REQUEST IS WITHDRAWN/SETTLED/ETC, AWARD AMOUNT JOINTLY AND SEVERALLY;
ATTORNEY'S FEES, RELIEF REQUEST IS WITHDRAWN/SETTLED/ETC, AWARD AMOUNT JOINTLY AND SEVERALLY; PUNITIVE/EXEMPLARY DAMAGES, RELIEF REQUEST IS WITHDRAWN/SETTLED/ETC, AWARD AMOUNT JOINTLY AND SEVERALLY

Occurrence#	1652687	Disclosure Type	Customer Complaint
FINRA Public Disclosable	Yes	Reportable	Yes
Material Difference in Disclosure	No		
Filing ID	37212328	Form (Form Version)	U4 (05/2009)
Filing Date	08/11/2014		
Source	39262 - WESTERN INTERNATIONAL SECURITIES, INC.		
Disclosure Questions Answered	14I(1)(a)		

Customer Complaint DRP

DRP Version 05/2009

1. Customer name(s): JOHN AND LAMIA CROWLEY

2. Residence information:

A. Customer(s) state of residence: Maryland

B. Other state(s) of residence/ detail:

3. Employing firm: WESTERN INTERNATIONAL SECURITIES, INC

4. Allegation(s):

DESPITE THEIR FINANCIAL SOPHISTICATION AND WEALTH OF EXPERIENCE, CLIENTS, WHO AUTHORIZED ALL TRADES BEFORE THEY WERE ENTERED, ALLEGE BREACH OF VARIOUS DUTIES ARISING FROM "UNSUITABLE" TRANSACTIONS FROM 2010-2012, A PERIOD THAT WAS FIVE YEARS AFTER THEY BEGAN THEIR RELATIONSHIP. BECAUSE THE ALLEGATIONS ARE WITHOUT MERIT AND ARE BROUGHT IN BAD FAITH, WE INTEND TO SEEK A DISMISSAL OF THE

employee. What should I do?

If there are job openings, you can apply for an employee position. But, if the company insists on calling you and paying you as an independent contractor, and you feel that the job you are doing fits the IRS and DOL factors defining an employee, the solution may be difficult.

First, you should talk to an attorney who can help you analyze your situation. Then, you can decide whether going to management or going to a government agency is the best way to address your concern. Where a company is avoiding employment laws by calling large numbers of workers independent contractors, the DOL may act to enforce federal law

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21. I don't think my company is operating under the IRS standards. Should I report them to the IRS?

First, you should talk to an attorney who can help you analyze the IRS factors. Even though reporting IRS violations is a protected activity, you might expose yourself to unlawful retaliation. If you want the IRS to determine whether you are an employee, you can file an IRS Form SS-8.

The IRS also has a hotline (800-829-0433) where you can make a report. For more information, and/or other ways to report IRS violations, see the IRS page, How Do You Report Suspected Tax Fraud Activity?

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22. Who enforces the law?

The IRS, the DOL, and similar state agencies enforce wage, hour, and tax laws. Independent contractors must rely on the terms of their independent contractor agreement, or the implied understanding, and would have to go to court to enforce that agreement or understanding. Possible claims might include breach of contract and breach of promise, sometimes called promissory estoppel. For more information, see our site's contracts page.

The Fair Labor Standards Act (FLSA) is enforced by the Wage-Hour Division of the DOL. The Wage-Hour Division's enforcement of the FLSA is carried out by investigators stationed across the U.S. who conduct investigations and gather data on wages, hours, and other employment conditions or practices in order to determine whether an employer has complied with the law. Where violations are found, they also may recommend changes in employment practices to bring an employer into compliance.

It is a violation of the FLSA to fire, or in any other way discriminate against an employee, for filing a complaint or participating in a legal proceeding.

Willful violations may be prosecuted criminally and the violator fined up to \$10,000. A second



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Maryland Independent Contractors: What you need to know

Whether a worker is an “employee” or an “independent contractor” is critical when it comes to such important issues as pension eligibility, workers’ compensation coverage, wage and hour law, and many other matters. In some situations, federal law will govern, but the question is most often resolved by looking to state law, particularly in areas such as unemployment tax liability, workers’ compensation, and state wage and hour requirements.

Workplace Fraud Act (WFA). The state of Maryland has enacted a WFA specifically designed to address issues of employee misclassification in the construction and landscaping industries. The WFA requires employers in the construction and landscaping industries to give an individual classified as an independent contractor or an exempt person with whom they contract notice of their classification and an explanation of what that classification means. A copy of the notice in both English and Spanish is available on Maryland’s Division of Labor and Industry’s website at www.dlir.state.md.us/workplace (<http://www.dlir.state.md.us/workplace/>).

Employers in the landscaping and construction industries must also keep, for at least 3 years, records containing the following information:

1. The name, address, occupation, and classification of each employee or independent contractor;
2. The rate of pay for each employee or method of payment for each independent contractor;
3. The amount paid each pay period to each employee or independent contractor;
4. For each independent contractor or exempt person hired, the regulations further require that the employer keep at the worksite or place of business: a. A description of the employers’ business or a contract between the employer and the independent contractor ...

Read more about Independent Contractors (<http://hr.blr.com/topics.aspx?>)



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District of Columbia Independent Contractors: What you need to know

Whether a worker is an “employee” or an “independent contractor” is critical when it comes to such important issues as pension eligibility, workers' compensation coverage, wage and hour law, and many other matters. In some situations, federal law will govern, but the question is most often resolved by looking to state law, particularly in areas such as unemployment tax liability, workers' compensation, and state wage and hour requirements.

For a Limited Time receive a FREE HR Report on the "Critical HR Recordkeeping". This exclusive special report covers hiring records, employment relationships, termination records, litigation issues, electronic information issues, tips for better recordkeeping, and a list of legal requirements. Download Now (<http://hrdailyadvisor.blr.com/2013/06/28/critical-hr-recordkeeping>)

An employer-employee relationship is a prerequisite for determining whether an individual is eligible for workers' compensation coverage (*DC Code Sec. 32-1501*). The District of Columbia Court of Appeals has ruled that the test for deciding this question is whether the individual is hired to do work in which the employer specializes. The test has two parts. First, the nature and character of the individual's work must be examined, including the degree of skill involved, the extent to which it is a separate calling or business, and the extent to which, when performing this work, an individual can be expected to carry his or her own accident burden. The second part of the test is the relationship of the work to the employer's business, including the extent to which the work is a regular part of the employer's regular business, whether the work is continuous or intermittent, and whether the duration of the job is sufficient to amount to the hiring of continuing services, as distinguished from contracting for the completion of a particular job (*Gross v. District of Columbia Dept. of Employment Services*, 826 A.2d 393 (D.C., 2003)).