

February 21, 2002, a letter was dispatched to RESPONDENT which enumerated certain documentation and information that must be provided as part of the application for registration, in particular an item-by-item accounting of all disciplinary items enumerated in CRD. By letter, dated February 28, 2002, RESPONDENT provided a response; however, additional information was subsequently requested on April 5, 2002 and May 24, 2002.

3. On February 21, 2002, a visitation letter was dispatched to RESPONDENT's clearing firm, Advanced Clearing, Inc. ("Advanced"), for a listing of Alabama clients of RESPONDENT, and documents, including transaction reports detailing transactions and date of transactions, if any.

4. On March 5, 2002, the Commission received transaction information from Advanced reflecting RESPONDENT has 3 open accounts with Alabama residents numbered 449-022059 opened 02/01/02 (no activity); 449-021819 opened 12/27/01 (no activity) and 449-008283 opened 12/09/97 (5 buys and 2 sales during the period 12/09/97 to 03/09/00).

5. Review of the files of the Commission, disclosed no record of registration or exemption from registration of RESPONDENT as a dealer in the state of Alabama.

CONCLUSIONS OF LAW

6. RESPONDENT is not registered nor exempt from registration as a dealer in the state of Alabama, and has effected securities transactions with a resident of the state of Alabama.

7. Transacting business in the state of Alabama as a dealer, without benefit of registration or exemption from registration, is a violation of Section 8-6-3(a), Code of Alabama 1975.