

**FINANCIAL INDUSTRY REGULATORY AUTHORITY  
LETTER OF ACCEPTANCE, WAIVER, AND CONSENT  
NO. 2021071987901**

TO: Department of Enforcement  
Financial Industry Regulatory Authority (FINRA)

RE: Robin Lee Taliaferro (Respondent)  
General Securities Representative  
CRD No. 442144

Pursuant to FINRA Rule 9216, Respondent Robin Lee Taliaferro submits this Letter of Acceptance, Waiver, and Consent (AWC) for the purpose of proposing a settlement of the alleged rule violations described below. This AWC is submitted on the condition that, if accepted, FINRA will not bring any future actions against Respondent alleging violations based on the same factual findings described in this AWC.

**I.**

**ACCEPTANCE AND CONSENT**

A. Respondent accepts and consents to the following findings by FINRA without admitting or denying them:

**BACKGROUND**

Robin Lee Taliaferro first registered with FINRA in 1987. Taliaferro registered with FINRA as a General Securities Representative and a General Securities Principal through associations with Western International Securities, Inc. from November 2013 through January 2020 and with Sutter Securities Inc. and Boustead Securities, LLC from January 2020 through July 2021. Since November 2021, Taliaferro has been registered with FINRA as a General Securities Representative through an association with another FINRA member.

On January 31, 1989, the State of Connecticut issued a Special Stipulation Order imposing a \$750 fine on Taliaferro for effecting a securities transaction for a Connecticut resident without being registered in the state.<sup>1</sup>

**OVERVIEW**

Taliaferro refused to produce information and documents requested pursuant to FINRA Rule 8210, in violation of FINRA Rules 8210 and 2010.

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<sup>1</sup> For more information about the respondent, including prior regulatory events, visit BrokerCheck® at [www.finra.org/brokercheck](http://www.finra.org/brokercheck).

## FACTS AND VIOLATIVE CONDUCT

This matter originated from a FINRA cause investigation of Taliaferro.

FINRA Rule 8210(a) states that, for purposes of an investigation, FINRA may require any person subject to its jurisdiction to provide information and to permit FINRA staff to inspect and copy books and records that are in the person's possession, custody, or control. FINRA Rule 8210(c) provides that "[n]o . . . person shall fail to provide information . . . or to permit an inspection and copying of books, records, or accounts pursuant to this Rule." A violation of FINRA Rule 8210 is also a violation of FINRA Rule 2010.

In July 2021, FINRA began investigating Taliaferro to determine whether he engaged in any sales practice violations during his associations with Western International, Sutter Securities, and Boustead Securities. On May 24, 2022, FINRA sent a request to Taliaferro for the production of information and documents pursuant to FINRA Rule 8210. As stated in his counsel's letter to FINRA on June 14, 2022, and by this agreement, Taliaferro acknowledges that he received FINRA's request and will not produce the information and documents requested.

By refusing to produce the information and documents as requested pursuant to FINRA Rule 8210, Taliaferro violated FINRA Rules 8210 and 2010.

B. Respondent also consents to the imposition of the following sanctions:

- a bar from associating with any FINRA member in all capacities.

Respondent understands that if he is barred or suspended from associating with any FINRA member, he becomes subject to a statutory disqualification as that term is defined in Article III, Section 4 of FINRA's By-Laws, incorporating Section 3(a)(39) of the Securities Exchange Act of 1934. Accordingly, he may not be associated with any FINRA member in any capacity, including clerical or ministerial functions, during the period of the bar or suspension. *See* FINRA Rules 8310 and 8311.

The sanctions imposed in this AWC shall be effective on a date set by FINRA. A bar or expulsion shall become effective upon approval or acceptance of this AWC.

## II.

### WAIVER OF PROCEDURAL RIGHTS

Respondent specifically and voluntarily waives the following rights granted under FINRA's Code of Procedure:

- A. To have a complaint issued specifying the allegations against him;

- B. To be notified of the complaint and have the opportunity to answer the allegations in writing;
- C. To defend against the allegations in a disciplinary hearing before a hearing panel, to have a written record of the hearing made, and to have a written decision issued; and
- D. To appeal any such decision to the National Adjudicatory Council (NAC) and then to the U.S. Securities and Exchange Commission and a U.S. Court of Appeals.

Further, Respondent specifically and voluntarily waives any right to claim bias or prejudgment of the Chief Legal Officer, the NAC, or any member of the NAC, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

Respondent further specifically and voluntarily waives any right to claim that a person violated the ex parte prohibitions of FINRA Rule 9143 or the separation of functions prohibitions of FINRA Rule 9144, in connection with such person's or body's participation in discussions regarding the terms and conditions of this AWC, or other consideration of this AWC, including its acceptance or rejection.

### **III.**

#### **OTHER MATTERS**

Respondent understands that:

- A. Submission of this AWC is voluntary and will not resolve this matter unless and until it has been reviewed and accepted by the NAC, a Review Subcommittee of the NAC, or the Office of Disciplinary Affairs (ODA), pursuant to FINRA Rule 9216;
- B. If this AWC is not accepted, its submission will not be used as evidence to prove any of the allegations against Respondent; and
- C. If accepted:
  - 1. this AWC will become part of Respondent's permanent disciplinary record and may be considered in any future action brought by FINRA or any other regulator against Respondent;
  - 2. this AWC will be made available through FINRA's public disclosure program in accordance with FINRA Rule 8313;
  - 3. FINRA may make a public announcement concerning this agreement and its subject matter in accordance with FINRA Rule 8313; and

4. Respondent may not take any action or make or permit to be made any public statement, including in regulatory filings or otherwise, denying, directly or indirectly, any finding in this AWC or create the impression that the AWC is without factual basis. Respondent may not take any position in any proceeding brought by or on behalf of FINRA, or to which FINRA is a party, that is inconsistent with any part of this AWC. Nothing in this provision affects Respondent's right to take legal or factual positions in litigation or other legal proceedings in which FINRA is not a party. Nothing in this provision affects Respondent's testimonial obligations in any litigation or other legal proceedings.

Respondent certifies that he has read and understands all of the provisions of this AWC and has been given a full opportunity to ask questions about it; Respondent has agreed to the AWC's provisions voluntarily; and no offer, threat, inducement, or promise of any kind, other than the terms set forth in this AWC and the prospect of avoiding the issuance of a complaint, has been made to induce him to submit this AWC.

July 11, 2022

\_\_\_\_\_  
Date

*Robin Lee Taliaferro*

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Robin Lee Taliaferro  
Respondent

Reviewed by:

*Steve Young*

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Steve Young  
Counsel for Respondent  
Keesal, Young & Logan  
400 Oceangate, Suite 1400  
Long Beach, CA 90802

Accepted by FINRA:

July 15, 2022

\_\_\_\_\_  
Date

Signed on behalf of the  
Director of ODA, by delegated authority

*Douglas Ramsey*  
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Douglas Ramsey  
Senior Director  
FINRA  
Department of Enforcement  
300 South Grand Avenue, Suite 1600  
Los Angeles, CA 90071