

1
2
3
4
5
6
7
8

**STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS
SECURITIES DIVISION**

9
10
11
12
13
14
15

IN THE MATTER OF DETERMINING
whether there has been a violation of the
Securities Act of Washington by:

Order Number S-04-136-05-CO01

CONSENT ORDER

Teresa E. White-Snyder,

Respondent.

16

INTRODUCTION

17
18
19
20
21
22

On March 18, 2005, the Securities Division, Department of Financial Institutions, State of Washington (the "Securities Division"), issued Statement of Charges S-04-136-05-SC01 (hereinafter referred to as the "Statement of Charges") against Respondent Teresa E. White-Snyder. Pursuant to the Securities Act of Washington, RCW 21.20, the Securities Division and Respondent Teresa E. White-Snyder do hereby enter into this Consent Order in settlement of the above captioned matter. Respondent Teresa E. White-Snyder neither admits nor denies the following Findings of Fact and Conclusion of Law:

FINDINGS OF FACT

I. Respondent

23
24
25

1. Teresa E. White-Snyder ("White-Snyder") was registered with the Washington State Securities Division as a securities salesperson for D.A. Davidson & Co. from June 2001 to April 2003, for A.G. Edwards & Sons, Inc. from July 1997 to June 2001, and for Murphy Favre, Inc. from October 1989 to July 1997. While employed by D.A. Davidson & Co., White-Snyder conducted business in an office in Colville, Washington. She currently resides in Filer, Idaho.

1 **II. Nature of the Conduct**

2 *Summary*

3 2. From approximately July 1997 through January 2003, White-Snyder borrowed money from
4 at least four of her brokerage customers. Described below in more detail are loans received by White-
5 Snyder in relation to two of these customers.

6 *Vicki B.*

7 3. Vicki B., a Washington resident, was a customer of White-Snyder at D.A. Davidson & Co.
8 On or about January 7, 2002, at White-Snyder's request, Vicki B.¹ ("Vicki") loaned her \$1,400. Vicki
9 wrote a check in the amount of \$1,400 made payable to White-Snyder, which White-Snyder
10 subsequently deposited in her personal bank account. White-Snyder promised to repay Vicki within one
11 month with interest.

12 4. On or about February 13, 2002, at White-Snyder's request, Vicki loaned her \$17,000. Vicki
13 wrote a check in the amount of \$17,000 made payable to White-Snyder, which White-Snyder
14 subsequently deposited in her personal bank account. On or about February 12, 2002, White-Snyder
15 signed a promissory note written on D.A. Davidson & Co. letterhead stating that she owed Vicki \$17,000
16 plus 12% interest.

17 5. On or about January 15, 2003, at White-Snyder's request, Vicki loaned her \$300. Vicki
18 wrote a check in the amount of \$300 made payable to White-Snyder, which White-Snyder subsequently
19 deposited in her personal bank account.

20 6. On or about February 5, 2003, at White-Snyder's request, Vicki loaned her \$18,000. Vicki
21 wrote a check in the amount of \$18,000 made payable to White-Snyder, which White-Snyder
22

1 subsequently deposited in her personal bank account. White-Snyder promised to repay Vicki within one
2 month with interest. On or about May 8, 2003, White-Snyder signed a promissory note on D.A.
3 Davidson & Co. letterhead stating that she owed Vicki \$18,300.

4 7. To date, White-Snyder has repaid approximately \$19,925 of the \$36,700 given to her by
5 Vicki.

6 *Newell W.*

7 8. Newell W. (“Newell”), a Washington resident, was a customer of White-Snyder’s at D.A.
8 Davidson & Co.

9 9. On or about September 26, 2002, at White-Snyder’s request, Newell loaned her \$10,000.
10 Newell wrote a check in the amount of \$10,000 made payable to White-Snyder, which White-Snyder
11 subsequently deposited in her personal bank account. White-Snyder promised to repay the loan by the
12 end of 2002.

13 10. Newell died on May 18, 2004. White-Snyder did not repay Newell prior to his death. On
14 or about August 31, 2004, White-Snyder signed a promissory note stating that she owed Newell’s estate
15 \$10,000 plus 5% interest. To date, White-Snyder has made four payments totaling approximately \$800
16 to Newell’s daughter on this promissory note.

17 *D.A. Davidson & Co.*

18 11. D.A. Davidson & Co. prohibited their employees from borrowing money from customers
19 throughout the time period that White-Snyder was employed by the firm.

20 12. On or about January 9, 2003, D.A. Davidson & Co. required White-Snyder to sign a
21 document entitled “Certification by Registered Personnel” related to her knowledge and understanding of
22

23 ¹ The full names of customers are omitted to protect their privacy.
CONSENT ORDER

1 compliance matters and prohibited practices. By signing this document, White-Snyder certified that she
2 had reviewed, understood, and agreed with D.A. Davidson & Co.'s policy that prohibited employees
3 from borrowing money from customers of the firm.

4 Based upon the above Findings of Fact, the following Conclusion of Law is made:

5 **CONCLUSION OF LAW**

6 Teresa E. White-Snyder, as described above, engaged in one or more dishonest or unethical
7 practices in the securities business, as defined by WAC 460-22B-090(1), by engaging in the practice of
8 borrowing money from customers. Such practice is grounds for the denial of registrations pursuant to
9 RCW 21.20.110(1)(g), and for the imposition of fines pursuant to RCW 21.20.110(1).

10 **CONSENT ORDER**

11 Based upon the foregoing,

12 IT IS AGREED AND ORDERED that Teresa E. White-Snyder shall cease and desist from
13 violation of RCW 21.20.010, the anti-fraud section of the Securities Act of Washington.

14 IT IS FURTHER AGREED AND ORDERED that further licensure of Teresa E. White-Snyder is
15 denied and Teresa E. White-Snyder shall not make application for nor be granted a broker-dealer,
16 investment adviser, securities salesperson, or investment adviser representative license from the date of
17 entry of this Consent Order by the Securities Administrator.

18 IT IS FURTHER AGREED that Teresa E. White-Snyder shall cooperate fully with the Securities
19 Division in any and all investigations, litigations, or other proceedings relating to or arising from the
20 matters described in this Consent Order.

21 IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this Consent
22 Order.

1 IT IS FURTHER AGREED that Teresa E. White-Snyder had the opportunity to obtain counsel,
2 that she has read and fully understands the contents of this Consent Order, that she agrees freely and
3 without threat or coercion of any kind to comply with the terms and conditions stated herein, and that she
4 waives her right to a hearing on this matter and to judicial review of this matter pursuant to RCW
5 21.20.440 and Chapter 34.05 RCW.

6 SIGNED this 25th day of May, 2005.

7
8 */s/ Teresa E. White-Snyder*

9 _____
Teresa E. White-Snyder

10 THIS ORDER DATED AND ENTERED THIS 1st DAY OF JUNE, 2005 BY:

11
12 *Michael E. Stevenson*

13 _____
MICHAEL E. STEVENSON
14 Securities Administrator

15 Approved for entry by:

Presented by:

16 *Martin Cordell*

17 *Chad Standifer*

18 _____
Martin Cordell
Chief of Enforcement

19 _____
Chad C. Standifer
Senior Enforcement Attorney