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

IN THE MATTER OF DETERMINING ) Order No.: S-17-2348-18-CO01  
whether there has been a violation of the )  
Securities Act of Washington by: ) CONSENT ORDER  
)  
Shawn Anthony Mesaros; )  
PAMRIA LLC, )  
)  
Respondents. )

**INTRODUCTION**

On December 8, 2017, the Securities Administrator of the state of Washington issued a Statement of Charges and Summary Order Suspending Investment Adviser Registration and Investment Adviser Representative Registration and Notice of Intent to Revoke Registration and Enter Order to Cease and Desist, Deny Future Registrations, Impose Fines, and Recover Costs (“Statement of Charges and Summary Order”), Order number S-17-2348-17-TO01, against the respondents, PAMRIA LLC and Shawn Anthony Mesaros. Pursuant to the Securities Act of Washington, RCW 21.20, the Securities Division and the respondents, PAMRIA LLC and Shawn Anthony Mesaros, do hereby enter into this Consent Order in settlement of the matters set forth in the Statement of Charges and Summary Order and as alleged below. The respondents, PAMRIA LLC and Shawn Anthony Mesaros, neither admit nor deny the Findings of Fact and Conclusions of Law as stated below.

**FINDINGS OF FACT**

**Respondents**

1. Shawn Anthony Mesaros (“Mesaros”) is a resident of Seattle, Washington. Mesaros is the owner, sole investment adviser representative, and sole control person of PAMRIA LLC. Mesaros has been registered with the State of Washington as an investment adviser representative at various firms since 2001 and was previously registered as a securities salesperson from 1993 until 2010. Mesaros worked as a

1 registered securities salesperson and investment adviser representative at Morgan Stanley from June 2009  
2 until Morgan Stanley discharged him in May 2010 for using marketing materials without Morgan Stanley's  
3 approval. Mesaros has a Central Registration Depository ("CRD") number of 2336693.

4 2. PAMRIA LLC ("PAMRIA") is a Washington State limited liability company formed on April 19,  
5 2010. PAMRIA maintains its principal place of business at 601 Union Street, in Seattle, Washington. On  
6 May 20, 2010, PAMRIA became registered as an investment adviser with the State of Washington. As  
7 recently as March 25, 2017, PAMRIA reported having approximately \$20.5 million in assets under  
8 management and 67 discretionary accounts. PAMRIA has a CRD number of 154027.

#### 9 **Related Party**

10 3. Airmap Holdings LLC ("Airmap Holdings") is a Washington State limited liability company formed  
11 on June 19, 2017. Airmap Holdings principal place of business is located in Hoquiam, Washington. On June  
12 26, 2017, Airmap Holdings purchased all of Mesaros's LLC membership interest in PAMRIA. On December  
13 12, 2017, the Court of Appeals of the State of Washington Division II filed a decision that will effectively  
14 negate the sale of PAMRIA to Airmap Holdings, and will leave Mesaros as the sole owner of PAMRIA.

#### 15 **Nature of the Conduct**

16 4. As registrants with the Securities Division, Mesaros and PAMRIA each had a duty to disclose to the  
17 Securities Division Mesaros's unsatisfied judgments, his suspension from FINRA membership, and his  
18 liability in an arbitration claim involving an investment business. These failures to disclose can form a basis  
19 to suspend or revoke registrations.

20 5. One of Mesaros's unsatisfied judgments led to his temporary loss of control of PAMRIA when a  
21 creditor foreclosed on Mesaros's ownership interest in PAMRIA. During this temporary loss of control,  
22 Airmap Holdings was decreed to be the exclusive owner of PAMRIA, and Airmap Holdings was authorized  
23 to conduct all PAMRIA company business.  
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1 6. As a registrant with the Securities Division, PAMRIA had a duty to notify the Securities Division  
2 when it was sold to Airmap Holdings. Failing to notify the Securities Division about the change in ownership  
3 of a registered investment adviser can form a basis to suspend or revoke registrations. Further, PAMRIA  
4 clients must consent to the assignment of their investment advisory contract to a new owner.

5 *Judgments Against Mesaros*

6 7. On June 9, 2006, Mesaros signed an agreed order of child support. In this order, Mesaros admitted to  
7 having an outstanding child support obligation of \$2,761.20 ("Judgment 1").

8 8. On May 30, 2014, the King County Superior Court entered an order of child support. The court  
9 entered a judgment against Mesaros in the amount of \$36,892.98 ("Judgment 2"). This amount included the  
10 following debt obligations: \$24,119.84 from June 10, 2006 through May 15, 2014 for back child support and  
11 January 1, 2011 through April 30, 2014 for other unpaid obligations, \$3,000 towards attorney fees, and  
12 \$9,773.14 for medical support.

13 9. As of November 2017, Mesaros owes \$75,360.88 in child support arrearage.

14 10. On October 13, 2015, the Grays Harbor County Superior Court entered a judgment and decree of  
15 foreclosure in favor of Timberland Bank and against Mesaros ("Judgment 3"). The total amount Mesaros  
16 owed on this judgment and award for costs and attorney fees was \$386,499.25. This debt was secured by  
17 commercial property. On May 27, 2016, this commercial property was sold at a Sherriff's sale for \$202,400.  
18 On June 27, 2016, the Grays Harbor County Superior Court confirmed the sale of the commercial property  
19 and entered a deficiency judgment in favor of Timberland Bank and against Mesaros for over \$184,000  
20 ("Judgment 4"). On December 12, 2017, the Court of Appeals of the State of Washington Division II held  
21 that the Sherriff's sale of the commercial property was invalid and set aside the confirmation of the sale of  
22 the commercial property, which will effectively void the deficiency judgment.  
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1 11. On November 16, 2015, the King County Superior Court entered a judgment in favor of Morgan  
2 Stanley Smith Barney LLC (“Morgan Stanley”) and against Mesaros (Judgment 5”). The total amount  
3 Mesaros owed on the judgment, as of November 16, 2015, was \$367,113.24. This amount included the  
4 following debt obligations: the principal debt of \$299,640, arbitration costs of \$1,000, prejudgment interest  
5 of \$66,134.24, and court costs of \$339. As of October 24, 2017, Mesaros had made no payments towards this  
6 judgment amount and the outstanding amount owed, after calculating in accrued interest, is approximately  
7 \$395,000.

8 *FINRA Arbitration Award Against Mesaros*

9 12. On May 3, 2013, Mesaros was found liable to Morgan Stanley in the amount of \$299,640. The  
10 Arbitrator found that Morgan Stanley had paid Mesaros a “signing bonus” of \$539,352. Mesaros signed a  
11 promissory note in favor of Morgan Stanley for this amount, which provided for repayment in nine equal  
12 installments. The promissory note provided that if Mesaros was terminated for any reason then the balance of  
13 the note would become immediately due. On May 12, 2010, Morgan Stanley terminated Mesaros for using  
14 marketing materials without Morgan Stanley’s approval. At the time of his termination, Mesaros had made  
15 four of the nine payments towards the promissory note debt.  
16

17 *FINRA Suspension of Securities Salesperson License Against Mesaros*

18 13. On August 15, 2013, the Financial Industry Regulatory Authority (FINRA) suspended Mesaros.  
19 FINRA reported that Mesaros failed to comply with an arbitration award or settlement agreement or to  
20 satisfactorily respond to a FINRA request to provide information concerning the status of compliance. This  
21 suspension effectively barred Mesaros from reobtaining his license to act as a securities salesperson.  
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*Foreclosure of Mesaros's Membership Interest in PAMRIA*

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2 14. On June 27, 2016, Timberland Bank obtained a deficiency judgment, described above in paragraph  
3 10, against Mesaros for over \$184,000. The Grays Harbor County Superior Court granted Timberland  
4 Bank's request for a charging order against Mesaros's interest in PAMRIA.

5 15. On June 26, 2017, Mesaros's LLC membership interest in PAMRIA was sold at a Sherriff's sale to  
6 Airmap Holdings for \$10,000. On July 31, 2017, the Grays Harbor County Superior Court entered an order  
7 confirming this sale and decreed that Airmap Holdings is the exclusive owner of PAMRIA.

8 16. On December 12, 2017, the Court of Appeals of the State of Washington Division II filed a decision  
9 that will effectively negate the sale of PAMRIA to Airmap Holdings, and will leave Mesaros as the sole  
10 owner of PAMRIA.

*False Form ADV Filings*

Form ADV Part 1

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14 17. Form ADV Part 1 is a uniform disclosure form used by investment advisers to register with the  
15 Securities and Exchange Commission ("SEC") and state securities authorities. An investment adviser  
16 provides information about its business, ownership, clients, and affiliations in the Form ADV Part 1. Form  
17 ADV Part 1 also requires the investment adviser to answer certain disclosure questions. An investment  
18 adviser's Form ADV Part 1 is also publicly available on the SEC's Investment Adviser Public Disclosure  
19 website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

20 18. Form ADV Part 1B Item 2D asks investment advisers whether any advisory affiliate (including  
21 control persons) has any unsatisfied judgments. A "Yes" answer to Item 2D requires the adviser to complete  
22 a Judgment/Lien Disclosure Reporting Page. From 2010 through 2017, in its annual amendments to Form  
23 ADV Part 1B, PAMRIA falsely answered "No" to Item 2D. From 2010 through 2014, at the time of the  
24 filings, PAMRIA's control person, Mesaros, had an unsatisfied judgment (Judgment 1). In 2015, at the time  
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1 of the filings, PAMRIA's control person, Mesaros, had an unsatisfied judgment (Judgment 2). From 2016  
2 through 2017, at the time of the filings, PAMRIA's control person, Mesaros, had two unsatisfied judgments  
3 (Judgment 3 & Judgment 5). In 2017, at the time of the filings, PAMRIA's control person, Mesaros, had an  
4 unsatisfied judgment (Judgment 4).

5 19. Form ADV Part 1B Item 2E asks investment advisers whether any advisory affiliate (including  
6 control persons) has been the subject of an arbitration claim alleging damages in excess of \$2,500 involving  
7 an investment business. A "Yes" answer to Item 2E requires the adviser to complete an Arbitration  
8 Disclosure Reporting Page. From 2014 through 2017, in its annual amendments to Form ADV Part 1B,  
9 PAMRIA falsely answered "No" to Item 2E. At the time of the filings, PAMRIA's control person, Mesaros,  
10 had been found liable in an arbitration claim involving Morgan Stanley, an investment business, in the  
11 amount of \$299,640. Mesaros falsely certified that the information in the Form ADV was true and correct on  
12 four separate occasions.

13  
14 20. Form ADV Part 1A Item 11E asks investment advisers whether any advisory affiliate (including  
15 control persons) has been suspended by a self-regulatory organization. A "Yes" answer to Item 11E requires  
16 the adviser to complete a Regulatory Action Disclosure Reporting Page. From 2014 through 2017, in its  
17 annual amendments to Form ADV Part 1A, PAMRIA falsely answered "No" to Item 11E. At the time of the  
18 filings, PAMRIA's control person, Mesaros, had been suspended by FINRA. Mesaros, as the control person  
19 for PAMRIA, signed the annual amendments. In doing so, Mesaros falsely certified that the information in  
20 the Form ADV was true and correct on four separate occasions.

21 Form ADV Part 2

22 21. Beginning in 2011, Form ADV Part 2 requires investment advisers to provide new and prospective  
23 clients with a brochure that is written in plain English and that provides meaningful disclosure about the  
24 background of the investment adviser firm. This brochure is designed to help clients and prospective clients  
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1 to evaluate the risks associated with a particular investment adviser, its business practices, and its investment  
2 strategies. Investment advisers are required to deliver to existing clients, on an annual basis, a summary of  
3 material changes to this brochure along with a copy of the revised brochure or an offer to deliver a copy of  
4 the revised brochure. An investment adviser's Form ADV Part 2 is also publicly available on the SEC's  
5 Investment Adviser Public Disclosure website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).

6 22. Form ADV Part 2A Item 18B requires investment advisers with discretionary authority over client  
7 funds to disclose any financial condition that is reasonably likely to impair its ability to meet contractual  
8 commitments to clients. From 2012 through 2017, in its annual amendments to Form ADV Part 2A Item  
9 18B, PAMRIA failed to disclose all of Mesaros's outstanding judgments. From 2012 through 2014, at the  
10 time of the filings, PAMRIA's control person, Mesaros, had an unsatisfied judgment (Judgment 1). In 2015,  
11 at the time of the filings, PAMRIA's control person, Mesaros, had an unsatisfied judgment (Judgment 2).  
12 From 2016 through 2017, at the time of the filings, PAMRIA's control person, Mesaros, had two unsatisfied  
13 judgments (Judgment 3 & Judgment 5). In 2017, at the time of the filings, PAMRIA's control person,  
14 Mesaros, had an unsatisfied judgment (Judgment 4).

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16 23. Form ADV Part 2A Item 19D requires investment advisers to disclose all material facts regarding a  
17 management person being found liable in an arbitration claim involving an investment business. From 2014  
18 through 2017, in its annual amendments to Form ADV Part 2A Item 19D, PAMRIA failed to disclose the  
19 FINRA Arbitration Award finding Mesaros liable to Morgan Stanley in the amount of \$299,640.

20 24. Form ADV Part 2A Item 9C requires investment advisers to disclose disciplinary events that are  
21 material to a client's evaluation of its advisory business or the integrity of its management. From 2014  
22 through 2017, in its annual amendments to Form ADV Part 2A, PAMRIA failed to disclose Mesaros's  
23 FINRA suspension.  
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### Failure to Update Form ADV

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2 25. Under WAC 460-24A-205, each investment adviser must promptly file a notice of changes regarding  
3 their business on their Form ADV. An amendment is considered promptly filed if it is filed within 30 days of  
4 the event that requires the filing of the amendment.

5 26. The Sherriff's sale of Mesaros's membership interest in PAMRIA to Airmap Holdings required  
6 PAMRIA to file an amended Form ADV to update Form ADV Part 1A Schedule A. Form ADV Part 1A  
7 Schedule A requires investment advisers to provide information about the direct owners and executive  
8 officers of the business. PAMRIA failed to file an amended Form ADV Part 1A Schedule A within 30 days  
9 of the sale of Mesaros's PAMRIA LLC membership interest to Airmap Holdings.

10 27. Mesaros's FINRA suspension required PAMRIA to file an amended Form ADV to change its answer  
11 to Form ADV Part 1A Item 11E and Form ADV Part 2A Item 9C. Item 11E and Item 9C require investment  
12 advisers to disclose disciplinary events that are material to a client's evaluation of its advisory business or the  
13 integrity of its management. PAMRIA failed to file an amended Form ADV within 30 days of FINRA's  
14 suspension of Mesaros.  
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16 28. All of Mesaros's outstanding judgments required PAMRIA to file an amended Form ADV to change  
17 its answer to Form ADV Part 1B Item 2D and Form ADV Part 2A Item 18B. Form ADV Part 1B Item 2D  
18 asks investment advisers whether any advisory affiliate (including control persons) has any unsatisfied  
19 judgments. Form ADV Part 2A Item 18B requires investment advisers with discretionary authority over  
20 client funds to disclose any financial condition that is reasonably likely to impair its ability to meet  
21 contractual commitments to clients. PAMRIA failed to file an amended Form ADV within 30 days of each  
22 of the following judgments: Judgment 1, Judgment 2, Judgment 3, Judgment 4, and Judgment 5.

23 29. The FINRA Arbitration Award finding Mesaros liable to Morgan Stanley, in the amount of \$299,640,  
24 required PAMRIA to file an amended Form ADV to change its answer to Form ADV Part 1B Item 2E and  
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1 Form ADV Part 2A Item 19D. Form ADV Part 1B Item 2E asks investment advisers whether any advisory  
2 affiliate (including control persons) has been the subject of an arbitration claim alleging damages in excess  
3 of \$2,500 involving an investment business. Form ADV Part 2A Item 19D requires investment advisers to  
4 disclose all material facts regarding a management person being found liable in an arbitration claim  
5 involving an investment business. PAMRIA failed to file an amended Form ADV within 30 days of the  
6 arbitration award.

### 7 **Failure to Update Form U4**

8 30. Form U4 is a uniform application that individuals must complete in order to register as securities  
9 salespersons or investment adviser representatives. Form U4 contains history and background information of  
10 applicants, including outstanding judgments and disciplinary events.

11 31. Under WAC 460-24A-205, investment adviser representatives have a continuing obligation to update  
12 the information required by Form U4 as changes occur. Investment adviser representatives must promptly  
13 file with the Investment Adviser Registration Depository ("IARD") any amendments to their Form U4. An  
14 amendment is considered promptly filed if it is filed within 30 days of the event that requires the filing of the  
15 amendment.  
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17 32. Item 14M of Form U4 asks applicants whether they have any unsatisfied judgments or liens against  
18 them.

19 33. Mesaros was required to file an amended Form U4 to change answers to Item 14M each time a new  
20 judgment was filed against him. Mesaros failed to file an amended Form U4 within 30 days of each of the  
21 following judgments: Judgment 1, Judgment 2, Judgment 3, Judgment 4, and Judgment 5.

22 34. Item 14E of Form U4 asks applicants whether they have been suspended from membership in any  
23 self-regulatory organization.  
24  
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1 35. After Mesaros was suspended by FINRA, Mesaros was required to file an amended Form U4 to  
2 change answers to Item 14E. Mesaros failed to file an amended Form U4 within 30 days of his FINRA  
3 suspension.

#### 4 CONCLUSIONS OF LAW

5 1. Pursuant to RCW 21.20.450 and WAC 460-24A-047, the Form ADV filings that Mesaros made on  
6 behalf of PAMRIA constitute filings with the director for purposes of RCW 21.20.350.

7 2. PAMRIA and Mesaros each willfully violated RCW 21.20.350 by making Form ADV filings from  
8 2010 through 2017 that were materially false or misleading, as described above in the Tentative Findings of  
9 Fact. Pursuant to RCW 21.20.110(1)(a) and RCW 21.20.110(1)(b), such conduct is grounds for the following  
10 sanctions: fines against PAMRIA and Mesaros; suspension and/or revocation of PAMRIA's registration as  
11 an investment adviser and Mesaros's registration as an investment adviser representative; denial of any  
12 future investment adviser, broker-dealer, investment adviser representative, or securities salesperson  
13 applications that PAMRIA and Mesaros may file. Pursuant to RCW 21.20.110(7), such conduct is grounds to  
14 charge costs incurred in the administrative investigation and hearing of this matter.  
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16 3. PAMRIA violated WAC 460-24A-205 because it failed to promptly file amendments to its Form  
17 ADV to disclose that Airmap Holdings was the exclusive owner of PAMRIA, as described above in the  
18 Tentative Findings of Fact. Pursuant to RCW 21.20.110(1)(a) and RCW 21.20.110(1)(b), such conduct is  
19 grounds for a fine, suspension and/or revocation of PAMRIA's registration as an investment adviser, and  
20 denial of any future investment adviser, broker-dealer, investment adviser representative, or securities  
21 salesperson applications that PAMRIA may file. Pursuant to RCW 21.20.110(7), such conduct is grounds to  
22 charge costs incurred in the administrative investigation and hearing of this matter.

23 4. PAMRIA violated WAC 460-24A-205 because it failed to promptly file amendments to its Form  
24 ADV to disclose Mesaros's outstanding judgments, FINRA suspension, and liability in an arbitration award  
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1 involving an investment related business, as described above in the Tentative Findings of Fact. Pursuant to  
2 RCW 21.20.110(1)(a) and RCW 21.20.110(1)(b), such conduct is grounds for a fine, suspension and/or  
3 revocation of PAMRIA's registration as an investment adviser, and denial of any future investment adviser,  
4 broker-dealer, investment adviser representative, or securities salesperson applications that PAMRIA may  
5 file. Pursuant to RCW 21.20.110(7), such conduct is grounds to charge costs incurred in the administrative  
6 investigation and hearing of this matter.

7 5. Mesaros violated WAC 460-24A-205 because he failed to promptly file amendments to his Form U4  
8 to disclose his outstanding judgments and his suspension from FINRA membership, as described above in  
9 the Tentative Findings of Fact. Pursuant to RCW 21.20.110(1)(a) and RCW 21.20.110(1)(b), such conduct is  
10 grounds for a fine, suspension and/or registration of Mesaros's registration as an investment adviser  
11 representative, and denial of any future investment adviser, broker-dealer, investment adviser representative,  
12 or securities salesperson applications that Mesaros may file. Pursuant to RCW 21.20.110(7), such conduct is  
13 grounds to charge costs incurred in the administrative investigation and hearing of this matter.  
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### 15 CONSENT ORDER

16 Based upon the foregoing and finding it in the public interest:

17 IT IS AGREED AND ORDERED that the investment adviser representative registration of Shawn  
18 Anthony Mesaros shall be, and hereby is, suspended beginning retroactively on December 12, 2017 and  
19 ending on the date this Consent Order is entered.

20 IT IS FURTHER AGREED AND ORDERED that the investment adviser registration of PAMRIA  
21 LLC shall be, and hereby is, suspended beginning retroactively on December 12, 2017 and ending on the  
22 date this Consent Order is entered.  
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1 IT IS FURTHER AGREED AND ORDERED that PAMRIA LLC and Shawn Anthony Mesaros, and  
2 their agents and employees, each cease and desist from violation of RCW 21.20.350 and WAC 460-24A-  
3 205.

4 IT IS FURTHER AGREED AND ORDERED that PAMRIA LLC shall be liable for and shall pay a  
5 fine of \$3,000. Said payment is to be made to the Division prior to entry of this Consent Order.

6 IT IS FURTHER AGREED AND ORDERED that Shawn Anthony Mesaros shall be liable for and  
7 shall pay a fine of \$5,000.

8 IT IS FURTHER AGREED AND ORDERED that the respondents, PAMRIA LLC and Shawn  
9 Anthony Mesaros, shall reimburse the Securities Division \$1,000 for its costs incurred in its investigation of  
10 this matter.

11 IT IS FURTHER AGREED AND ORDERED that the payment of the remaining fines and costs  
12 described above shall be made as follows: Respondent Shawn Anthony Mesaros shall pay the investigative  
13 costs and his fine in monthly payments for the following twelve consecutive months, with each monthly  
14 payment in the amount of \$500. The first \$1,000 in payments will pay the investigative costs balance, and  
15 the remaining \$5,000 in payments will pay his fine. Each payment shall be due on the first business day  
16 following the first day of the month.

17  
18 IT IS FURTHER AGREED AND ORDERED that the following paragraph shall be included in the  
19 Form ADV Part 2 of PAMRIA LLC until January 12, 2028: "On December 12, 2017, the Securities Division  
20 of the Washington State Department of Financial Institutions entered a Statement of Charges and Summary  
21 Order (order number S-17-2348-17-TO01) against PAMRIA LLC and Shawn Anthony Mesaros. The  
22 Statement of Charges and Summary Order alleged that the parties violated provisions of the Washington  
23 Securities Act. Without admitting or denying the allegations made in the Statement of Charges and Summary  
24 Order, PAMRIA LLC and Shawn Anthony Mesaros each settled the matter by Consent Order. This Consent  
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1 Order contained the following sanctions: the suspension of Shawn Anthony Mesaros's investment adviser  
2 representative registration, the suspension of PAMRIA LLC's investment adviser registration, an order to  
3 cease and desist from violation of RCW 21.20.350 and WAC 460-24A-205, and payment of fines and costs."

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

5 IT IS FURTHER AGREED that the respondents, PAMRIA LLC and Shawn Anthony Mesaros, enter  
6 into this Consent Order freely and voluntarily and with a full understanding of its terms and significance.

7 IT IS FURTHER AGREED that in consideration of the foregoing, the respondents, PAMRIA LLC  
8 and Shawn Anthony Mesaros, each withdraw their request for a hearing and each waive their right to a  
9 hearing and to judicial review of this matter.

10  
11 WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.

12  
13 Signed this 17<sup>th</sup> day of January 2017.

14  
15 Signed by:

16 PAMRIA LLC

17  
18 /s/

19 Shawn Anthony Mesaros  
Control Person

20 Signed by:

21  
22 /s/

23 Shawn Anthony Mesaros, individually

SIGNED and ENTERED this 19<sup>th</sup> day of January 2018 .



*William M. Beatty*

William M. Beatty  
Securities Administrator

Approved by:

Presented by:

*Suzanne Sarason*

*Brian J. Guerard*

Suzanne Sarason  
Chief of Enforcement

Brian J. Guerard  
Financial Legal Examiner

Reviewed by:

*Jack McClellan*

Jack McClellan  
Financial Legal Examiner Supervisor