



STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS

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

Airlink Markets, LLC,
Respondent.

DFI No. S-23-3608-24-FO01
OAH No. 07-2024-DFI-00173

FINAL DECISION & ORDER AS TO AIRLINK
MARKETS, LLC

THE STATE OF WASHINGTON TO: Airlink Markets, LLC

THIS MATTER has come before the Director (“Director”) of the Washington State Department of Financial Institutions (“Department”) for entry of the Director’s Final Decision & Order pursuant to RCW 34.05.464.

1.0 PROCEDURAL HISTORY

On March 6, 2024, the Director, through Securities Administrator William M. Beatty, entered a Summary Order to Suspend Registration and Notice of Intent to Revoke Registration, Deny Future Registrations, Impose a Fine, and Charge Costs, S-23-3608-24-TO01, (“Summary Order”) against Respondent Airlink Markets, LLC. The Summary Order, together with a Notice of Opportunity for Hearing and an Application for Adjudicative Hearing, were served on Respondent Airlink Markets, LLC, by certified mail on March 7, 2024. Respondent Airlink Markets, LLC, on April 8, 2024, submitted an Application for Adjudicative Hearing. On July 9, 2024, the Department made a request to the Office of Administrative Hearings (“OAH”) to assign an Administrative Law Judge (“ALJ”) to schedule and conduct a hearing on the Summary Order.

On July 18, 2024, OAH issued a Notice of Prehearing Conference from ALJ TJ Martin. The Notice of Prehearing Conference contained the following language: “You must call in to the conference. If you fail to call in, the administrative law judge may hold you in default and dismiss your appeal. RCW 34.05.440(2).”

1 On August 1, 2024, the Department’s representative, Assistant Attorney General Stephen Manning, attended
2 the prehearing conference by telephone, but Respondent Airlink Markets, LLC, failed to appear or otherwise contact
3 OAH. On August 7, 2024, ALJ TJ Martin issued an Order Dismissing Appeal against Respondent Airlink Markets,
4 LLC, and dismissed Respondent’s appeal.

5 Pursuant to RCW 34.05.464 and WAC 10-08-211, Respondent Airlink Markets, LLC, had twenty (20) days
6 from the date of service of the Order Dismissing Appeal to file a Petition for Review. Respondent Airlink Markets,
7 LLC, did not file a Petition for Review during the statutory period.

8 2.0 RECORD ON REVIEW

9 The record presented to the Director for his review and for entry of a Final Decision & Order included the
10 following:

- 11 2.1 Summary Order, with documentation of service;
- 12 2.2 Application for Adjudicative Hearing for Airlink Markets, LLC;
- 13 2.3 Request to OAH for Assignment of Administrative Law Judge;
- 14 2.4 Notice of Prehearing Conference, dated July 18, 2024, with certificate of service; and
- 15 2.5 Order Dismissing Appeal, dated August 7, 2024, with certificate of service.

16 3.0 FINDINGS OF FACT AND CONCLUSIONS OF LAW

17 Pursuant to RCW 34.05.461, the Director hereby adopts the Summary Order, which is attached hereto.

18 4.0 FINAL DECISION & ORDER

19 Based upon the foregoing, and the Director having considered the record and being otherwise fully advised,
20 NOW, THEREFORE, IT IS HEREBY ORDERED:

- 21 4.1 Respondent Airlink Markets, LLC, shall be liable for and shall pay a fine of \$10,000.
- 22 4.2 Respondent Airlink Markets, LLC, shall be liable for and shall pay costs of \$500 for the investigation
23 of their violations of the Securities Act of Washington, chapter 21.20. RCW.
- 4.3 Pursuant to RCW 21.20.110(1)(g), the broker-dealer license for Respondent Airlink Markets, LLC, is
revoked.

1 4.4 Pursuant to RCW 21.20.110(1)(g), any future applications for broker-dealer or investment adviser
2 registration that Respondent Airlink Markets, LLC, may file shall be denied.

3 5.0 RECONSIDERATION

4 Pursuant to RCW 34.05.470, the Respondent has the right to file a Petition for Reconsideration stating the
5 specific grounds upon which relief is requested. The Petition must be filed in the Office of the Director of the
6 Department of Financial Institutions by courier at 150 Israel Road SW, Tumwater, Washington 98501, or by U.S.
7 Mail at P.O. Box 41200, Olympia, Washington 98504-1200, within ten (10) days of service of the Final Order upon
8 Respondents. The Petition for Reconsideration shall not stay the effectiveness of this order nor is a Petition for
9 Reconsideration a prerequisite for seeking judicial review in this matter.

10 A timely Petition for Reconsideration is deemed denied if, within twenty (20) days from the date the petition
11 is filed, the agency does not (a) dispose of the petition or (b) serve the parties with a written notice specifying the date
12 by which it will act on a petition.

13 6.0 STAY OF ORDER

14 The Director has determined not to consider a Petition to Stay the effectiveness of this order. Any such
15 requests should be made in connection with a Petition for Judicial Review made under chapter 34.05 RCW and RCW
16 34.05.550.

17 7.0 JUDICIAL REVIEW

18 Respondent has the right to petition the superior court for judicial review of this agency action under the
19 provisions of chapter 34.05 RCW. For the requirements for filing a Petition for Judicial Review, see RCW 34.05.510
20 and sections following.

21 8.0 NON-COMPLIANCE WITH ORDER

22 If Respondent does not comply with the terms of this order, the Department may seek its enforcement by the
23 Office of Attorney General to include the collection of fines and fees imposed herein. Failure to comply with this
Final Decision & Order may also prompt additional actions against Respondent by the Department as permitted by the
Securities Act of Washington, Chapter 21.20 RCW, for failure to comply with a lawful order of the Department.

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9.0 SERVICE

For purposes of filing a Petition for Reconsideration or a Petition for Judicial Review, service is effective upon deposit of this order in the U.S. mail with a declaration of service attached hereto.

DATED this 28th day of October 2024.

STATE OF WASHINGTON
DEPARTMENT OF FINANCIAL INSTITUTIONS



Charles E. Clark, Director
Washington State Department of Financial Institutions

CERTIFICATE OF SERVICE

I, Jeanette Baluyut, certify that I personally delivered or mailed a copy of the Final Decision and Order to parties named below at their respective addresses, postage pre-paid, on October 28, 2024.

Jeanette Baluyut
Jeanette Baluyut, Executive Assistant
Washington State Department of Financial Institutions

Mailed to the following:

Airlink Markets, LLC
27112 SE Grand Ridge Drive
Issaquah, WA 98029

Stephen Manning, Esq.
Assistant Attorney General
Office of the Attorney General
PO Box 40100
Olympia, WA 98504-0100

Airlink Markets, LLC
166 Triple Crown Ct.
Milton, GA 30004

William M. Beatty, Esq.
Washington Department of Financial Institutions
Securities Division
150 Israel Rd SW
Tumwater, WA 98501

Airlink Markets, LLC
1400 112th Ave SE, Suite 100
Bellevue, WA 98004

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

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

Airlink Markets, LLC,

Respondent.

Order No. S-23-3608-24-TO01

SUMMARY ORDER TO SUSPEND REGISTRATION
AND NOTICE OF INTENT TO REVOKE
REGISTRATION, DENY FUTURE REGISTRATIONS,
IMPOSE A FINE, AND CHARGE COSTS

8 **THE STATE OF WASHINGTON TO:**

Airlink Markets, LLC (CRD 322261)

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STATEMENT OF CHARGES

Please take notice that the Securities Administrator of the State of Washington has reason to believe that an officer, director, partner, or person performing similar functions for Respondent Airlink Markets, LLC has engaged in dishonest and unethical business practices in the securities industry, and that those practices justify the suspension of Airlink Markets, LLC's broker-dealer registration under RCW 20.20.110(1)(g). The Securities Administrator further has reason to believe that those practices justify the entry of an order of the Securities Administrator to revoke Airlink Markets, LLC's broker-dealer registration, deny any future securities registration applications pursuant to RCW 21.20.110(1)(g), and to impose fines and costs pursuant to RCW 21.20.110(1) and (7). The Securities Administrator finds that delay in suspending the Respondent's registration would be hazardous to the public interest and is necessary or appropriate for the protection of investors and that a Summary Order should be entered immediately. The Securities Administrator finds as follows:

TENTATIVE FINDINGS OF FACT

Respondent

1 suspension of Respondent Airlink Markets, LLC's broker-dealer registration and for the imposition of a fine
2 pursuant to RCW 20.20.110(1)(g).

3 **SUMMARY ORDER**

4 Based upon the foregoing and finding it in the public interest,

5 IT IS HEREBY SUMMARILY ORDERED that the broker-dealer registration for Respondent Airlink
6 Markets, LLC is summarily suspended pending a final determination in this proceeding.

7 **NOTICE OF INTENT TO REVOKE REGISTRATION**

8 Pursuant to RCW 21.20.110(1)(g) and based upon the above Tentative Findings of Fact and
9 Conclusions of Law, the Securities Administrator intends to order that the Respondent Airlink Markets,
10 LLC's broker-dealer license be revoked.

11 **NOTICE OF INTENT TO DENY FUTURE REGISTRATIONS**

12 Pursuant to RCW 21.20.110(1)(g) and based upon the above Tentative Findings of Fact and
13 Conclusions of Law, the Securities Administrator intends to deny any future applications for broker-dealer
14 or investment adviser registration that Respondent Airlink Markets may file in the future.

15 **NOTICE OF INTENT TO IMPOSE FINES**

16 Pursuant to RCW 21.20.110(1)(g) and RCW 21.20.395 and based upon the above Tentative Findings
17 of Fact and Conclusions of Law, the Securities Administrator intends to order that Respondent Airlink
18 Markets, LLC be liable for and pay a fine of \$10,000.

19 **NOTICE OF INTENT TO CHARGE COSTS**

20 Pursuant to RCW 21.20.110(7) and RCW 21.20.390 and based upon the above Tentative Findings of
21 Fact and Conclusions of Law, the Securities Administrator intends to order that Respondent Airlink Markets,
22 LLC shall pay the costs, fees, and other expenses incurred in the administrative investigation and hearing of
23 this matter, in an amount not less than \$500.

1 **AUTHORITY AND PROCEDURE**

2 This Statement of Charges is entered pursuant to the provisions of Chapter 21.20 RCW and is subject
3 to the provisions of RCW 21.20.120 and Chapter 34.05 RCW. The Respondent Airlink Markets, LLC may
4 make a written request for a hearing as set forth in the Notice of Opportunity for Hearing accompanying this
5 Order.

6 If the Respondent does not make a hearing request in the time allowed, the Securities Administrator
7 intends to adopt the above Tentative Findings of Fact and Conclusions of Law as final as to the Respondent
8 and, as described above, enter a permanent order to revoke its registration and bar future registrations, and
9 impose fines and costs sought.

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

11 SIGNED and ENTERED this 6th day of March 2024.



17 /s/

18 _____
19 William M. Beatty
20 Securities Administrator

21 Approved by:

22 /s/

23 _____
Brian J. Guerard
Chief of Enforcement

Presented by:

/s/

Brett Werenski
Financial Legal Examiner

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SUMMARY ORDER TO SUSPEND REGISTRATION
AND NOTICE OF INTENT TO REVOKE REGISTRATION,
DENY FUTURE REGISTRATIONS, IMPOSE A FINE,
AND CHARGE COSTS

DEPARTMENT OF FINANCIAL INSTITUTIONS
Securities Division
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