



STATE OF MISSOURI
OFFICE OF SECRETARY OF STATE

IN THE MATTER OF:

AJ&J INVESTMENT GROUP, INC.;)
MICHAEL ALAN LEEPER, JR.;) Case No. AP-14-01
AND EUGENE LESTER BARNES,)
Respondents.)

**FINAL ORDER TO CEASE AND DESIST AND ORDER AWARDING RESTITUTION
AND COSTS, AND IMPOSING CIVIL PENALTIES**

I. PROCEDURAL BACKGROUND

On February 19, 2014, the Enforcement Section of the Securities Division of the Office of the Missouri Secretary of State (the “Enforcement Section”), through Mary S. Hosmer, Tyler B. McCormick, and Jennifer J. Martin, submitted a Petition for an Order to Cease and Desist and Order to Show Cause Why Restitution, Civil Penalties, and Costs Should Not Be Imposed (the “Petition”). On March 5, 2014, the Commissioner issued an Order to Cease and Desist and Order to Show Cause Why Restitution, Civil Penalties, and Costs Should Not Be Imposed against Respondents.

On April 11, 2014, the Enforcement Section and the attorney for the Respondents, Reggie C. Giffin, submitted a Joint Motion for Final Order to Cease and Desist and Order Awarding Restitution and Costs and Imposing Civil Penalties (“Joint Motion”). In the Joint Motion, Respondents waived their right to a hearing in this matter, stipulated to the entry of a final order by the Commissioner, and also stipulated to the amount of restitution, costs, and civil penalties. Respondents’ waiver of a hearing left only a final order to be issued in this matter.¹ Thus, after reviewing the Petition and the Joint Motion, the Commissioner issues the following Final Order:

¹ See Coleman v. Missouri Sec'y of State, 313 S.W.3d 148, 156 (Mo. App. W.D. 2010) (stating that the respondent’s “withdrawal of his request for a hearing was qualitatively identical to never having requested a hearing in the first place. Thus, pursuant to section 409.6–604(b), the Commissioner [of Securities] was free to take action to enter the Final Order without conducting a hearing or otherwise complying with the requirements of section 409.6–604(c)”).

II. FINDINGS OF FACT

A. Respondents and Related Parties

1. AJ&J Investment Group, Inc. (“AJ&J”) is a Delaware corporation with a mailing address of P.O. Box 6193, Branson, Missouri 65615. AJ&J is registered with the State of Delaware, and AJ&J’s registered agent is United States Corporation Agents, Inc., 1521 Concord Pike, Suite 301, Wilmington, Delaware 19803.
2. Michael Alan Leeper, Jr. (“Leeper”) is a Missouri resident with an address of 173 Turtle Creek Drive, Apartment D108, Branson, Missouri 65616. Leeper is the President and Secretary of AJ&J.
3. Eugene Lester Barnes (“Barnes”) is a Missouri resident with an address of 276 Dandy Way, Branson, Missouri 65616. Barnes is the Chief Executive Officer and Treasurer of AJ&J.
4. E-TCB, Inc. (“E-TCB”) is a Nevada corporation organized on December 12, 2005, with a mailing address of 500 N. Rainbow Boulevard, Suite 300A, Las Vegas, Nevada 89107. E-TCB’s registered agent is Charles Rampenthal with a mailing address of 101 N. Brand Boulevard, 10th Floor, Glendale, California 91203. Barnes is the President of E-TCB.
5. OptionsXpress Inc. (“OptionsXpress”) is a Missouri registered broker-dealer with a home office address of 311 West Monroe Street, Suite 1000, Chicago, Illinois 60606. OptionsXpress is registered in Missouri through the Central Registration Depository (“CRD”) with a number of 103849.
6. T.D. Ameritrade, Inc. (“Ameritrade”) is a Missouri registered broker-dealer with a home office address of 200 South 108th Avenue, Omaha, Nebraska 68154. Ameritrade is registered in Missouri through the CRD with a number of 7870.
7. A check of the records maintained by the Commissioner indicates that, at all times relevant to this matter, neither Leeper nor Barnes was registered as a broker-dealer agent, investment adviser representative, or issuer agent in the State of Missouri.
8. A check of the records maintained by the Commissioner indicates that, at all times relevant to this matter, there was no registration, granted exemption, or notice filing indicating status as a “federal covered security” for the securities offered and sold by AJ&J, Barnes, and Leeper.
9. A check of the records maintained by the Commissioner indicates that, at all times relevant to this matter, AJ&J was not registered as a broker-dealer or investment adviser in the State of Missouri.

B. Enforcement Section Investigation

10. In 2012 and 2013, Leeper and Barnes solicited investments on behalf of AJ&J in an “Enhanced Premium Structured Note” (“EPSN”), a note that Leeper and Barnes created. Under the EPSN investment, AJ&J, Barnes, and Leeper:
 - a. promised to repay the investors nine months from the date of the investment;
 - b. guaranteed that the investors would receive their principal plus an interest rate of between 12% and 17%;
 - c. allowed the investor to “roll-over” into a new EPSN at the end of the nine month period. If the investor “rolled-over” into a second EPSN, the investor would receive a higher interest rate on the new EPSN; and
 - d. stated that investors’ money would be pooled in an OptionsXpress and/or Ameritrade account and traded by Barnes in accordance with Barnes’ trading formula.
11. AJ&J paid a fee to individuals who referred investors to AJ&J. This fee was in the amount of 3% of the total amount received from each of the referred EPSN investors.
12. Barnes received \$300 from AJ&J for referring one investor to AJ&J, and Leeper received \$2,760 for referring six investors to AJ&J.
13. Barnes, through E-TCB, held investment seminars in Missouri and sent out newsletters from Missouri containing stock trading recommendations. Barnes charged fees for these seminars and a subscription fee for the newsletters.
14. On September 30, 2012, Barnes sent e-mails from Missouri offering to sell the EPSN investments with AJ&J to over 70 individuals, including, among others, a Missouri resident (“MR1”) and a Tennessee resident (“TR”) (“Barnes 2012 E-Mail”). The Barnes 2012 E-Mail stated, among other things, “Here is the information on the EPSN that guarantees a 12% payout over 9 months, with a 14% [payout] if renewed for 9 more months. Check it out, and contact me if you have any quesitons [sic].”
15. Leeper and Barnes on behalf of AJ&J placed brochures (“AJ&J Brochures”) in local business establishments around Branson, Missouri offering to sell EPSN investments.
16. A Missouri resident (“MR2”) obtained one of the AJ&J Brochures from a Branson, Missouri business and sent a copy of this AJ&J Brochure to an investigator with the Enforcement Section.
17. The AJ&J Brochures stated, among other things:

- a. "As the usual mainstream programs like 401K's, IRA's, pension programs, etc., have become unreliable, and in most cases, completely disappointing, we have become the beacon of hope;"
 - b. "Our high end, Enhanced Premium Structured Programs will work for everyone . . . ;"
 - c. "You can lend your hard earned money to us, and we will give you a no nonsense rate of 12% in just 9 months, and then offer you 14% to do it again for another 9 months . . . that's in writing!;" and
 - d. "Ensure peace of mind over your Investments by investing with an EPSN® TODAY!"
18. In addition, these AJ&J Brochures contained a section titled "Testimonials," with quotes attributed to "Betty T." and "Rick E." The quotes stated, among other things:
- a. "I am scared. I now know that the Obama administration is enacting a law that will limit me to no more than [sic] 5% withdrawal on 401k's and IRA's. Neither are giving the premiums that the EPSN® is paying at AJ&J Investment Group, Inc.® 12% in 9 months, and I feel safer as a result"; and
 - b. "You guys are really impressive. I feel so much more confident in my future knowing I can count on this kind of return on my money."
19. Since 2012, Leeper and Barnes on behalf of AJ&J have operated a public website ("AJ&J website") that states, among other things:
- a. "AJ&J Investment Group, Inc.® is offering a 9 MONTH Enhanced Premium Structured Note®, at a 15% Interest Rate...Now is the perfect time for anyone looking to get a better rate than they can in a 401k or IRA"; and
 - b. "You can lend your hard earned money to us, and we will give you a no-nonsense rate 12% in just 9 months, and then offer you 14% to do it again for another 9 months . . . !"
20. The AJ&J website contained a section titled "Testimonials," with the same quotes attributed to "Betty T." and "Rick E." as provided above.
21. Barnes, Leeper, and AJ&J did not disclose on the AJ&J website or in the AJ&J Brochures that neither of the individuals mentioned in the testimonials had invested in an EPSN.
22. On September 30, 2012, a 68-year-old Georgia resident ("GR") received the above-described Barnes 2012 E-Mail offering to sell an EPSN investment.

23. In January 2013, GR attended a three (3) day E-TCB trading course taught by Barnes in Branson, Missouri (“E-TCB Seminar”). GR paid Barnes \$1,595 to attend the E-TCB Seminar.
24. Barnes and Leeper on behalf of AJ&J offered to sell EPSN investments to GR and to at least ten (10) other individuals who attended the E-TCB Seminar. At the E-TCB Seminar, Barnes and Leeper on behalf of AJ&J provided attendees with the AJ&J Brochures that offered to pay investors 12% to 14% interest on funds invested in an EPSN.
25. Barnes told the E-TCB Seminar attendees, among other things, that the EPSN was designed for people who wanted to profit from options trading without being vulnerable to or burdened by trading options on their own behalf.
26. On or about January 29, 2013, Leeper on behalf of AJ&J provided GR with an EPSN that stated, among other things, if GR invested with AJ&J, GR would be paid the initial investment plus 15% interest in nine months.
27. GR executed the EPSN and invested \$100,000 with AJ&J.
28. Additionally, GR paid Barnes a subscription fee to receive E-TCB’s monthly newsletter, which contained option trading recommendations.
29. Between approximately January 2013 and July 2013, GR traded options based on Barnes’ recommendations in the newsletter and lost \$77,000.
30. On October 29, 2013, GR spoke with Leeper regarding payment on GR’s EPSN. Leeper stated, among other things, that:
 - a. AJ&J did not have enough money to pay out all investors that had notes due on October 30, 2013; and
 - b. if AJ&J paid one EPSN investor back on October 30, 2013, the State of Missouri might think that AJ&J was a Ponzi scheme.
31. On October 30, 2013, GR spoke with Barnes who stated, among other things, that:
 - a. AJ&J was unable to take in any new business or pay out any old business while the State of Missouri’s inquiry was ongoing; and
 - b. once the inquiry was over, things would go back to normal.
32. On October 30, 2013, an employee with Ameritrade provided information to an investigator with the Enforcement Section that AJ&J’s account (“AJ&J Ameritrade Account”) had a current liquidation value of \$46,151.

33. To date, GR has never received any return of principal or any profits from GR's investment with AJ&J in the EPSN.
34. Between September 2012 and August 2013, AJ&J, Barnes, and Leeper offered and sold EPSN investments from Missouri to eight individuals residing in Missouri, Texas, and Georgia. These eight investors purchased eleven EPSNs from AJ&J, Barnes, and Leeper for a total of \$297,000.
35. Between June 2013 and September 2013, four investors in EPSNs rolled-over their funds into new EPSNs.
36. A review of the AJ&J Ameritrade Account revealed that at least some EPSN investors' funds were used, among other things, to:
 - a. pay for legal fees; and
 - b. pay for AJ&J advertising expenses.
37. On October 25, 2013, Leeper provided an on-the-record statement ("Leeper OTR") to representatives of the Enforcement Section. During the Leeper OTR, Leeper stated, among other things, that:
 - a. prior to starting AJ&J, Barnes showed Leeper several months of Barnes' trading history in an account at OptionsXpress;
 - b. Barnes' OptionsXpress account had hundreds of thousands of dollars in it;
 - c. after forming AJ&J, Leeper drafted the EPSN documents for AJ&J;
 - d. AJ&J invested the funds received from EPSN investors in equities and options through the AJ&J Ameritrade Account;
 - e. Barnes conducted all the trading and investing in the AJ&J Ameritrade Account;
 - f. Leeper was not aware of the balance of the AJ&J Ameritrade Account;
 - g. Barnes and Leeper both took a 3% referral fee from each EPSN they sold; and
 - h. despite using the registered trademark symbol on AJ&J's brochures and website, the phrase "Enhanced Premium Structured Note" had not been trademarked by AJ&J.
38. On November 15, 2013, Barnes provided an on-the-record statement ("Barnes OTR") to representatives of the Enforcement Section. During the Barnes OTR, Barnes stated, among other things, that:

- a. the business plan for AJ&J was to provide “a product that [investors] could get an absolute rate of return on their money”;
- b. Leeper was to provide information to individuals about the EPSN investment;
- c. Barnes was to conduct the trading of these investor funds based on a formula Barnes had learned over 14 years ago;
- d. Barnes learned the formula from a man whom Barnes met briefly in a hotel in Memphis, Tennessee. Barnes did not know the man’s last name;
- e. the formula was a “long distance cousin to the covered call trade”;
- f. Barnes had not realized any profits from trading based on this formula “in the last few years”;
- g. the EPNSNs were not, in fact, guaranteed;
- h. Barnes received a referral fee from AJ&J for referring an individual to invest in an EPSN;
- i. Barnes sent out information to his subscribers that stated, “Here is the information on the EPSN that guarantees a 12 percent payout over nine months with a 14 percent [payout] if renewed for nine more months. Check it out and contact me if you have any questions”;
- j. Barnes deposited funds from EPSN investors into an OptionsXpress account belonging to E-TCB (“E-TCB Account”) that was controlled by Barnes;
- k. EPSN investors’ funds in the Barnes E-TCB Account were frozen by OptionsXpress. OptionsXpress was investigating Barnes to determine if Barnes was trading in the accounts of others;
- l. Barnes subsequently transferred the funds from EPSN investors from the E-TCB Account to the AJ&J Ameritrade Account; and
- m. the testimonials on the AJ&J website about the EPNSNs were not from individuals who had invested in the EPNSNs.

C. Additional Findings

39. Barnes, Leeper, and AJ&J failed to disclose to GR, among other things, the following:
- a. that Barnes and Leeper were not registered or exempt from registration to offer or sell securities in the State of Missouri;

- b. that the securities were not registered or exempt from registration in the State of Missouri;
 - c. the specific risks associated with the investment, including that Barnes had learned of the investment strategy from a man whose name Barnes did not remember and that the investment strategy had not worked for years;
 - d. the background and history of Barnes;
 - e. financial information to support the promised return on the investments;
 - f. prior returns on other investments through Barnes;
 - g. that Barnes's E-TCB Account had been frozen by OptionsXpress;
 - h. the testimonials used were from individuals who had not invested in the EPSNs; and
 - i. investor funds would be used, among other things,
 - i. to pay legal fees; or
 - ii. to pay AJ&J advertising expenses.
40. Barnes, Leeper, and AJ&J misrepresented to GR, among other things, the following:
- a. that Barnes, Leeper, or AJ&J had registered trademarks; and
 - b. that the EPSN offered guaranteed rates of return.

III. CONCLUSIONS OF LAW

Multiple Violations of Offering and Selling Unregistered, Non-Exempt Securities

44. Barnes, Leeper, and AJ&J offered and sold more than one promissory note by:
- a. offering to sell EPSNs to numerous individuals;
 - b. receiving funds in Missouri from eight investors located in Missouri, Texas and Georgia for the purchase of EPSNs; and
 - c. providing these eight investors with EPSN documents that promised to pay a determinate sum of money at a fixed or determinable future time under specific terms.

45. These investments constitute promissory notes, and a note is a security pursuant to Section 409.1-102(28), RSMo. (Cum. Supp. 2012).
46. At all times relevant to this matter, there was no registration, granted exemption, or notice filing indicating status as a “federal covered security” for the securities offered and sold by Barnes, Leeper, and AJ&J.
47. Barnes, Leeper, and AJ&J offered and sold securities in Missouri without these securities being (1) a federal covered security, (2) exempt from registration under Sections 409.2-201 or 409.2-203, RSMo. (Cum. Supp. 2012), or (3) registered under the Missouri Securities Act of 2003.
48. Barnes, Leeper, and AJ&J offered and sold unregistered securities in violation of Section 409.3-301, RSMo. (Cum. Supp. 2012).
49. The conduct of Barnes, Leeper, and AJ&J in violation of Section 409.3-301, RSMo. (Cum. Supp. 2012), constitutes engaging in an illegal act, practice, or course of business and such conduct is, therefore, subject to the Commissioner’s authority under Section 409.6-604, RSMo. (Cum. Supp. 2012).

Multiple Violations of Transacting Business as an Unregistered Agent

50. Barnes is the Chief Executive Officer and Treasurer of AJ&J and represented AJ&J in Missouri in effecting or attempting to effect offers and sales of AJ&J’s securities.
51. Leeper is the President and Secretary of AJ&J and represented AJ&J and Barnes in Missouri in effecting or attempting to effect sales of AJ&J’s securities.
52. These activities constitute transacting business as an agent in the State of Missouri under Section 409.1-102(1), RSMo. (Cum. Supp. 2012).
53. At all times relevant to this matter, neither Barnes nor Leeper were registered as agents in the State of Missouri.
54. Barnes and Leeper offered and/or sold securities to investors in Missouri without being registered or exempt from registration as an agent in violation of Section 409.4-402(a), RSMo. (Cum. Supp. 2012).
55. The conduct of Barnes and Leeper in violation of Section 409.4-402(a), RSMo. (Cum. Supp. 2012), constitutes engaging in an illegal act, practice, or course of business, and such conduct is, therefore, subject to the Commissioner’s authority under Section 409.6-604, RSMo. (Cum. Supp. 2012).

Multiple Violations of Employing or Associating with an Unregistered Agent

56. AJ&J employed or associated with Barnes and Leeper who transacted business as agents in offering and/or selling securities on behalf of AJ&J.
57. AJ&J's activities constitute employing or associating with one or more agents in the State of Missouri under Section 409.4-402(d), RSMo. (Cum. Supp. 2012).
58. At all times relevant to this matter, AJ&J had no registration or granted exemption for any agents to transact business in the State of Missouri.
59. AJ&J employed or associated with an unregistered agent who transacted business in the State of Missouri in violation of Section 409.4-402(d), RSMo. (Cum. Supp. 2012).
60. The conduct of AJ&J in violation of Section 409.4-402(d), RSMo. (Cum. Supp. 2012), constitutes engaging in an illegal act, practice, or course of business, and such conduct is, therefore, subject to the Commissioner's authority under Section 409.6-604, RSMo. (Cum. Supp. 2012).

Multiple Violations of Making an Untrue Statement or Omitting to State Material Facts in Connection with the Offer or Sale of a Security

61. In connection with the offer, sale or purchase of a security to GR, Barnes, Leeper, and AJ&J omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, including, but not limited to, the following:
 - a. Barnes and Leeper were not registered or exempt from registration to offer or sell securities in the State of Missouri;
 - b. that the securities were not registered or exempt from registration in the State of Missouri;
 - c. the specific risks associated with the investment, including that Barnes had learned of the investment strategy from a man whose name Barnes did not remember and that the investment strategy had not worked for years;
 - d. the background and history of Barnes;
 - e. financial information to support the promised return on the investments;
 - f. prior returns on other investments through Barnes;
 - g. that Barnes' E-TCB Account had been frozen by OptionsXpress;
 - h. the testimonials used were from individuals who had not invested; and

- i. that investor funds would be used, among other things,
 - i. to pay legal fees; and
 - ii. for AJ&J advertising expenses.
- 62. In connection with the offer, sale or purchase of a security to GR, Barnes, Leeper, and AJ&J misrepresented, among other things, the following:
 - a. that Barnes, Leeper, or AJ&J had registered trademarks; and
 - b. that the EPSN offered guaranteed rates of return.
- 63. Barnes, Leeper, and AJ&J made untrue statements of material facts, or omitted to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading in violation of Section 409.5-501, RSMo. (Cum. Supp. 2012).
- 64. At the time Barnes, Leeper, and AJ&J engaged in the conduct set forth above, GR was a person 60 years of age or older and was an elderly person as that term is defined under Section 409.6-604(d)(3)(B), RSMo. (Cum. Supp. 2012).
- 65. The conduct of Barnes, Leeper, and AJ&J in violation of Section 409.5-501, RSMo. (Cum. Supp. 2012), constitutes engaging in an illegal act, practice, or course of business, and such conduct is, therefore, subject to the Commissioner's authority under Section 409.6-604, RSMo. (Cum. Supp. 2012).

IV. ORDER

- A. **NOW, THEREFORE**, it is hereby ordered that Respondents, their agents, employees and servants, and all other persons participating in or about to participate in the above-described violations with knowledge of this order are prohibited from:
 - 1. violating or materially aiding in any violation of Section 409.3-301, RSMo. (Cum. Supp. 2009), by offering or selling any securities as defined by Section 409.1-102(28), RSMo. (Cum. Supp. 2009), in the State of Missouri unless those securities are registered with the Securities Division of the Office of the Secretary of State in accordance with the provisions of Section 409.3-301;
 - 2. violating or materially aiding in any violation of Section 409.4-402(a), RSMo. (Cum. Supp. 2009), by transacting business as an unregistered agent;
 - 3. violating or materially aiding in any violation of Section 409.4-402(d), RSMo. (Cum. Supp. 2009), by employing an unregistered agent; and

4. violating or materially aiding in any violation of Section 409.5-501, RSMo. (Cum. Supp. 2009), by, in connection with the offer or sale of securities, omitting to state a material fact necessary in order to make statements made, in light of the circumstances under which they are made, not misleading, or engaging in an act, practice, or course of business that operates or would operate as a fraud or deceit upon another person.
- B. **IT IS FURTHER ORDERED** that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2012), Respondents shall pay jointly and severally restitution in the amount of \$297,000. This amount shall be made payable to the Missouri Secretary of State's Investor Restitution Fund, and the Commissioner will take reasonable and necessary actions to distribute such funds to those persons referenced in Exhibit 1 attached hereto. This amount shall be sent to the Missouri Securities Division at 600 West Main Street, Jefferson City, Missouri 65101 within 90 days from the date of this Final Order;
- C. **IT IS FURTHER ORDERED** that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2012), Respondents shall pay jointly and severally the costs of the investigation in this matter in the amount of \$2,500. These funds shall be made payable to the Investor Education and Protection Fund and be sent to the Missouri Securities Division at 600 West Main Street, Jefferson City, Missouri 65101. Respondents' obligation to pay this amount is hereby suspended provided Respondents comply with the terms of this Final Order and do not violate the Missouri Securities Act for a period of three years from the date of this Final Order;
- D. **IT IS FURTHER ORDERED** that, pursuant to Section 409.6-604(d), RSMo. (Cum. Supp. 2012), Respondents shall jointly and severally pay a civil penalty in the amount of \$55,000, for multiple violations of Sections 409.3-301, 409.4-402, and 409.5-501, RSMo. (Cum. Supp. 2012). Respondents' obligation to pay this amount is hereby suspended provided Respondents comply with the terms of this Final Order and do not violate the Missouri Securities Act for a period of three years from the date of this Final Order; and
- E. The suspended payments in paragraphs C and D, above, shall, for three years from the date of this Final Order, become immediately payable, under operation of law, upon Respondents' failure to comply with the terms of this Final Order, and such immediately due payments shall be in addition to all other penalties then available under the law. The Commissioner will refer this matter for enforcement as provided in Sections 409.6-603 and 409.6-604, RSMo. (Cum. Supp. 2012). Upon Respondents' satisfaction of the restitution order in paragraph B, above, and Respondents' compliance with the terms of this Order for a period of three years from the date of this Final Order, the suspended payments in above paragraphs C and D shall be fully waived.
- F. Respondents shall pay Respondents' own costs and attorney's fees in this matter.

SO ORDERED:

WITNESS MY HAND AND OFFICIAL SEAL OF MY OFFICE AT JEFFERSON CITY,
MISSOURI THIS TWENTY-SECOND DAY OF MAY, 2014.

JASON KANDER
SECRETARY OF STATE



Andrew M. Hartnett

Andrew M. Hartnett
Commissioner of Securities

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of May, 2014, a copy of the foregoing Final Order to Cease and Desist and Order Awarding Restitution and Costs, and Imposing Civil Penalties in the above styled case was **mailed by U.S. mail to:**

Reggie C. Giffin
Reggie C. Giffin, P.C.
200 NW 47th Street
Kansas City, Missouri 64116
Telephone: (816) 588-6596
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COUNSEL FOR RESPONDENTS

and was hand delivered to:

Mary S. Hosmer
Assistant Commissioner
Missouri Securities Division

Tyler McCormick
Securities Enforcement Counsel
Missouri Securities Division

Jennifer Martin
Securities Enforcement Counsel
Missouri Securities Division



John Hale, Securities Office Manager