

COMMONWEALTH OF KENTUCKY  
PUBLIC PROTECTION CABINET  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
AGENCY CASE NO. 2018-AH-00025

DEPARTMENT OF FINANCIAL INSTITUTIONS

COMPLAINANT

vs.

RYAN SANFORD LAWSON

RESPONDENT

**AGREED ORDER**

**FACTUAL BACKGROUND**

1. The Kentucky Department of Financial Institutions (“DFI”) is responsible for administering the provisions of Kentucky Revised Statutes (“KRS”) Chapter 292, the Securities Act of Kentucky (“the Act”), as well as any applicable rules and regulations enacted thereunder.

2. Ryan Sanford Lawson (“Respondent”), CRD# 4959209, was a registered broker-dealer agent and investment adviser representative previously associated with U.S. Bancorp Investments, Inc., (“USBI”).

3. DFI conducted an investigation regarding Respondent’s securities-related activities during his employment with USBI. DFI discovered that on or around August 16, 2016, Respondent impersonated a client when he attempted to transfer the client’s assets from another firm to USBI.

**STATUTORY AUTHORITY**

4. Pursuant to KRS 292.320(1), [i]t is unlawful for any person, in connection with the offer, sale, or purchase of any security, directly or indirectly:

(a) To employ any device, scheme, or artifice to defraud;

(b) To make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they are made, not misleading; or

(c) To engage in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person.

5. 808 KAR 10:440 Section 1(18), identifies executing a transaction on behalf of a customer without authorization to do so as an example of a dishonest or unethical practice.

6. The Commissioner possesses a range of administrative authority in addressing violations of the Act, including suspension of registration and the imposition of civil fines up to twenty thousand dollars (\$20,000.00) for each violation of the Act. *See* KRS 292.337 and KRS 292.500(14).

#### CONCLUSIONS OF LAW

7. The Commissioner finds that this Agreed Order is in the public interest.
8. Respondent violated KRS 292.320(1).
9. Respondent violated 808 KAR 10:440 Section 1(18).

#### AGREEMENT AND ORDER

10. To resolve this matter without litigation or adversary proceedings, the DFI and Respondent agree to compromise and settle all claims arising from the above referenced factual background in accordance with the terms set forth herein.

11. In the interest of economically and efficiently resolving the violations described herein, DFI and Respondent agree as follows:

- a. Respondent agrees to a civil fine in the amount of **ten thousand dollars (\$10,000)** for the violations described herein, which shall be due and payable as follows:

- i. The first payment shall be for the amount of *one thousand seven hundred and fifty dollars* (\$1,750.00), and shall be due upon entry of this Agreed Order;
  - ii. The second payment shall be for the amount of *one thousand six hundred and twenty-five dollars* (\$1,625.00), and shall be due within thirty (30) calendar days of the entry of this Agreed Order;
  - iii. The third payment shall be for the amount of *one thousand six hundred and twenty five dollars* (\$1,625.00), and shall be due within sixty (60) calendar days of the entry of this Agreed Order;
  - iv. The remaining five thousand dollars (\$5,000.00) shall be due immediately upon Respondent's re-association with any FINRA member firm, or upon Respondent's application for registration with DFI as either an investment adviser representative or a broker-dealer agent.
- b. All payments under this Order shall be in the form of a certified check or money order made payable to "Kentucky State Treasurer" and mailed to the Department of Financial Institutions, Securities Division, 2018-AH-00025, 1025 Capital Center Drive, Suite 200, Frankfort, Kentucky 40601; and
  - c. Respondent shall be suspended from registration with DFI as an investment adviser representative or a broker-dealer agent for a period of one (1) year commencing upon the date of entry of this Agreed Order.

12. Respondent waives his right to demand a hearing at which he would be entitled to legal representation, to confront and cross-examine witnesses, and to present evidence on his own behalf, or to otherwise appeal or set aside this Agreed Order.

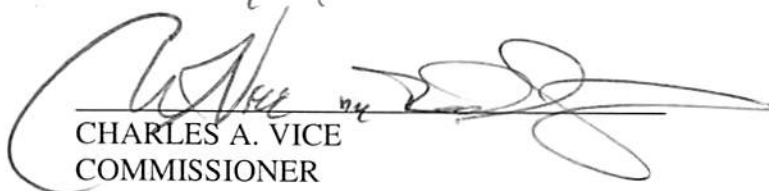
13. Respondent consents to and acknowledges the jurisdiction of DFI over this matter and that this Agreed Order is a matter of public record and may be disseminated as such.

14. In consideration of execution of this Agreed Order, Respondent for himself, and for his successors and assigns, hereby releases and forever discharges the Commonwealth of Kentucky, DFI, Office of Legal Services, and each of their members, agents, and employees in their individual capacities, from any and all manner of actions, causes of action, suits, debts, judgments, executions, claims and demands whatsoever, known and unknown, in law or equity, that Respondent ever had, now has, may have or claim to have against any or all of the persons or entities named in this paragraph arising out of or by reason of this investigation, this disciplinary action, this settlement or its administration.

15. By signing below, the parties acknowledge they have read the foregoing Agreed Order, know and fully understand its contents, and that they are authorized to enter into and execute this Agreed Order and legally bind their respective parties.

16. This Agreed Order shall constitute the Final Order in this matter.

**IT IS SO ORDERED** on this the 10<sup>th</sup> day of July, 2018.

  
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CHARLES A. VICE  
COMMISSIONER

Consented to:

This 10<sup>th</sup> day of July, 2018.

Marni Gibson

Marni Gibson, Director  
Division of Securities  
Department of Financial Institutions

AND

This 2<sup>nd</sup> day of July, 2018.

Ryan Sanford Lawson  
Ryan Sanford Lawson, CRD #4959209

ACKNOWLEDGEMENT

STATE OF Kentucky )  
 )  
COUNTY OF Warren )

On this the 2 day of July, 2018, before me Jessica Snodgrass,

**Ryan Sanford Lawson** personally appeared and acknowledged himself to be Ryan Sanford Lawson and acknowledged that he entered into and executed the foregoing instrument for the purposes therein contained.

My Commission Expires: 10/12/2021

Jessica Snodgrass  
Notary Public



**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing **Agreed Order** was sent on this the 11 day of July, 2018, by certified mail, return receipt requested, to:

Ryan Sanford Lawson  
628 Nutwood Street  
Bowling Green, KY 42103

And by Hand-Delivery to:

Mr. Stuart D. Michael  
1025 Capital Center Drive, Suite 200  
Frankfort, KY 40601  
Counsel for Department of Financial Institutions

  
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Kentucky Department of Financial Institutions