

**Expungement Award
FINRA Dispute Resolution Services**

In the Matter of the Arbitration Between:

Claimant

Heather Peterson Weber

Case Number: 24-01996

vs.

Respondents

Citigroup Global Markets, Inc.
Merrill Lynch Pierce Fenner & Smith Inc.

Hearing Site: Tampa, Florida

Awards are rendered by independent arbitrators who are appointed pursuant to Rule 13806 of the Code of Arbitration Procedure ("Code") to issue final, binding decisions. FINRA makes available an arbitration forum—pursuant to rules approved by the SEC—but has no part in deciding the award.

Nature of the Dispute: Associated Person vs. Members

The expungement hearing was conducted by videoconference.

REPRESENTATION OF PARTIES

For Claimant Heather Peterson Weber: Chelsea Bauer, Esq., HLBS Law, Broomfield, Colorado.

For Respondent Citigroup Global Markets, Inc. ("Citigroup"): Adam Kauff, Esq., Kauff Laton Miller LLP, New York, New York.

For Respondent Merrill Lynch Pierce Fenner & Smith Inc. ("MLPFS"): Kathryn Dietrich Perreault, Esq. and Shruti Jaishankar, Esq., Maynard Nexsen PC, Birmingham, Alabama.

CASE INFORMATION

Statement of Claim filed by Claimant on or about: September 16, 2024.
Heather Peterson Weber signed the Submission Agreement: September 16, 2024.

Statement of Answer filed by Respondent Citigroup on or about: November 18, 2024.
Citigroup Global Markets, Inc. signed the Submission Agreement: November 18, 2024.

Statement of Answer filed by Respondent MLPFS on or about: December 4, 2024.
Merrill Lynch Pierce Fenner & Smith Inc. signed the Submission Agreement: December 4, 2024.

CASE SUMMARY

In the Statement of Claim, Claimant asserted a claim seeking expungement of customer dispute information from registration records maintained by the Central Registration Depository ("CRD").

In the Statement of Answer, Respondent Citigroup did not oppose Claimant's request for expungement of Occurrence Numbers 1089358 and 986568, and took no position as to Occurrence Numbers 1831605, 1724250, 1891716, 1893855, 1929155, 1929156, 1935138, and 2048809.

In the Statement of Answer, Respondent MLPFS took no position as to Claimant's request for expungement.

RELIEF REQUESTED

In the Statement of Claim, Claimant (CRD Number 2911524) requested expungement of all references to Occurrence Numbers 986568, 1089358, 1724250, 1831605, 1891716, 1893855, 1929155, 1929156, 1935138, and 2048809 from the CRD registration records and any and all other relief that the Panel deems just and equitable.

In their respective Statements of Answer, Respondents Citigroup and MLPFS did not delineate a specific relief request.

OTHER ISSUES CONSIDERED AND DECIDED

The Arbitrators acknowledge that they have each read the pleadings and other materials filed by the parties.

On September 23, 2024, Claimant advised that the customers in Occurrence Numbers 1724250, 1831605, 1893855, 1929155, 1929156, 1935138, and 2048809 ("Customers") were served with a copy of the Statement of Claim within 10 days of filing the Statement of Claim and provided proof of service. The Panel determined that service by Claimant of the Statement of Claim on the customers in Occurrence Numbers 986568, 1089358 and 1891716 (the "Deceased Customers") was impracticable because they had passed away.

On November 25, 2024, Claimant advised that the Customers were served with a copy of the Respondent Citigroup's Statement of Answer within 10 days of its filing and provided proof of service. The Panel determined that service by Claimant of Respondent Citigroup's Statement of Answer on the Deceased Customers was impracticable because they had passed away.

On December 19, 2024, Claimant advised that the Customers were served with a copy of the Respondent MLPFS's Statement of Answer within 10 days of its filing and provided proof of service. The Panel determined that service by Claimant of Respondent MLPFS's Statement of Answer on the Deceased Customers was impracticable because they had passed away.

On October 1, 2024, the customers in Occurrence Number 1929156 registered for the DR Portal, providing them with access to all documents filed in the case and submitted a written statement.

On October 22, 2024, the authorized representative of the state securities regulator for California submitted a written statement.

On December 3, 2024, the authorized representative of the state securities regulator for Michigan submitted a written statement.

The Panel conducted recorded hearings by videoconference on June 9 and 10, 2025, so the parties could present oral argument and evidence on Claimant's request for expungement. Claimant appeared by videoconference at the expungement hearing. Respondents Citigroup and MLPFS also appeared at the expungement hearing and as stated in the Statement of Answer, Respondent Citigroup did not oppose Claimant's request for expungement of Occurrence Numbers 1089358 and 986568.

The Customers did not appear at the expungement hearing.

The authorized representative of the state securities regulator for California appeared at the expungement hearing by videoconference and opposed the expungement request.

The authorized representative of the state securities regulator for Michigan did not appear at the expungement hearing.

AWARD

After considering the pleadings, the testimony and evidence presented at the expungement hearing, and any post-hearing submissions, the Panel has decided in full and final resolution of the issues submitted for determination as follows:

1. Claimant's request for expungement of Occurrence Numbers 986568, 1089358, 1724250, 1831605, 1891716, 1893855, 1929155, 1929156, 1935138, and 2048809 from registration records maintained by the CRD is denied with prejudice. Pursuant to Rule 13805 of the Code, the Panel's decision to issue an award containing relief for expungement of customer dispute information must be unanimous. Arbitrator Darryl C. Wilson found that one or more of the grounds for expungement in Rule 13805 of the Code were established. Arbitrators Sharon R. Merriman and Barbara M. Zak did not make such a finding.
2. Any and all claims for relief not specifically addressed herein are denied.

FEES

Pursuant to the Code, the following fees are assessed:

Filing Fees

FINRA Dispute Resolution Services assessed a filing fee* for each claim:

Initial Claim Filing Fee	= \$ 1,600.00
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*The filing fee is made up of a non-refundable and a refundable portion.

Member Fees

Member fees are assessed to each member firm that is a party in these proceedings or to the member firm(s) that employed the associated person(s) at the time of the event(s) giving rise to the dispute. Accordingly, as parties, Respondents Citigroup and MLPFS are each assessed the following:

Member Surcharge	= \$ 2,000.00
Member Process Fee	= \$ 3,850.00

Hearing Session Fees and Assessments

The Panel has assessed hearing session fees for each session conducted. A session is any meeting between the parties and the Arbitrator(s), including a pre-hearing conference with the Arbitrator(s), which lasts four (4) hours or less. Fees associated with these proceedings are:

One (1) pre-hearing session with the Panel @ \$1,150.00/session	= \$ 1,150.00
Pre-Hearing Conference: December 16, 2024	1 session

Three (3) hearing sessions on expungement request @ \$1,150.00/session	= \$ 3,450.00
Hearings: June 9, 2025	2 sessions
June 10, 2025	1 session

Total Hearing Session Fees	= \$ 4,600.00
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The Panel has assessed the total hearing session fees to Claimant.

All balances are payable to FINRA Dispute Resolution Services and are due upon receipt.

ARBITRATION PANEL

Sharon R. Merriman	-	Public Arbitrator, Presiding Chairperson
Barbara M. Zak	-	Public Arbitrator
Darryl C. Wilson	-	Public Arbitrator

I, the undersigned Arbitrator, do hereby affirm that I am the individual described herein and who executed this instrument, which is my award.

Concurring Arbitrators' Signatures

Sharon R. Merriman

Sharon R. Merriman
Public Arbitrator, Presiding Chairperson

06/18/2025

Signature Date

Barbara M. Zak

Barbara M. Zak
Public Arbitrator

06/18/2025

Signature Date

Darryl C. Wilson

Darryl C. Wilson
Public Arbitrator

06/18/2025

Signature Date

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June 20, 2025

Date of Service (For FINRA Dispute Resolution Services use only)