

1 STATE OF CALIFORNIA
2 BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
3 DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION

4 TO: Webull Financial, LLC
5 44 Wall Street, Suite 501
6 New York, New York 10005

7 DESIST AND REFRAIN ORDER

8 (For violation of section 25241 of the Corporations Code)

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10 The Commissioner of the Department of Financial Protection and Innovation finds that:

- 11 1. At all relevant times, Webull Financial, LLC (Webull) held and holds a valid and unrevoked
- 12 broker-dealer certificate issued by the Commissioner on January 11, 2018 and is registered as a
- 13 broker-dealer with assigned Central Registration Depository (CRD) number 289063.
- 14 2. At all relevant times, Webull’s principal office was and is located at 44 Wall Street, Suite 501,
- 15 New York, New York 10005.
- 16 3. At all relevant times, Mr. Shen Lu was and is the Chief Compliance Officer of Webull.
- 17 4. Webull does not own or operate any offices in California but conducts its broker-dealer
- 18 services through its online website at webull.com and via mobile applications.
- 19 5. DFPI’s Broker-Dealer and Investment Advisory Program (BDIA) has regulatory examination
- 20 authority under California Corporations Code Section 25241 to conduct examinations of its broker-
- 21 dealer licensees for the protection of investors and in the public interest. Broker-dealers must comply
- 22 with the Corporate Securities Law of 1968 (CSL) (Corp. Code § 25000 et seq.) and the regulations
- 23 enacted thereunder (Cal. Code Regs., tit. 10, § 260.000 et seq.)
- 24 6. On February 11, 2021, BDIA examiners attempted to contact Webull to request
- 25 documentation relating to a consumer complaint filed with DFPI on February 8, 2020, regarding a
- 26 sell limit instruction on a client account. BDIA requested Webull respond by February 26, 2021. On
- 27 March 9, 2021, after the deadline lapsed, BDIA provided an extension to respond by March 12, 2021.
- 28 Again, this deadline was not met. Instead, BDIA examiners sent a delinquency response letter which

1 was delivered to Webull on March 22, 2021. To date, Webull has not responded to BDIA examiners
2 or provided the documentation requested.

3 Based on the foregoing findings, the Commissioner is of the opinion that Webull’s failure to
4 respond and permit BDIA examiners to review records related to an examination is a violation of
5 Corporations Code section 25241.

6 For the foregoing reasons and pursuant to Corporations Code section 25532, Webull is hereby
7 ordered to desist and refrain from violating Corporations Code section 25241 by failing to permit a
8 reasonable examination for the protection of investors and in the public interest.

9 This Order is necessary, in the public interest, for the protection of investors and consistent
10 with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

11 Dated: November 16, 2021

CHRISTOPHER S. SHULTZ
Acting Commissioner of Financial Protection and Innovation



14 By: _____

MARY ANN SMITH
Deputy Commissioner
Enforcement Division