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2	Commissioner		
3	MARY ANN SMITH Deputy Commissioner		
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10	SUPERIOR COURT OF CALIFORNIA		
11	SACRAMENTO COUNTY, CALIFORNIA		
12			
13	ROBERT MATTHEW KRIEGER, an) individual,	Case No. 24CV000068	
14		JOINT STIPULATION AND REQUEST	
15	Plaintiff,	FOR ENTRY OF ORDER OF EXPUNGEMENT AND DISMISSAL;	
16		[PROPOSED] ORDER THEREON	
17	CALIFORNIA DEPARTMENT OF		
18	FINANCIAL PROTECTION AND ()		
19			
20	Defendant.		
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22)		
23	This Joint Stipulation and Request for Entry of Order (Stipulation) is made by and between		
24	Plaintiff, ROBERT MATTHEW KRIEGER (Krieger) and Defendant, California Department of		
25	Financial Protection and Innovation (DFPI), (Parties), through their attorneys of record. The Parties		
26	stipulate as follows:		
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	JOINT STIPULATION AND REQUEST FOR ENTRY OF ORDER OF EXPUNGEMENT AND DISMISSAL; [PROPOSED] ORDER THEREON		
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1. On January 3, 2024, Krieger filed his Complaint for Expungement in Equitable Relief (Complaint). The Complaint was timely filed and served on DFPI on January 12, 2024.

2. The Complaint sought expungement of therein-described Krieger registration record Occurrence Number 1900077 (Record), which appears on nationwide databases maintained by the Financial Industry Regulatory Authority, Inc. (FINRA), specifically on the Central Registration Depository (CRD), Independent Adviser Public Disclosure (IAPD), Investment Adviser Registration Depository (IARD), and BrokerCheck.

3. The Record arose as a result of his termination from Global Retirement Partners LLC (GRP). GRP submitted a Form U5, which is a form submitted by an employer of an investment adviser representative (IAR) explaining the basis for termination of the IAR. This filing by GRP triggered a Form U5 termination event appearing on FINRA's IARD/CRD websites.

4. GRP does not oppose Krieger's request for expungement of the Record.

5. FINRA, the custodian of the Record, has no regulatory authority over investment advisors or their representatives; they simply maintain the database.

6. FINRA requires a court order before they will expunge any record from the databases they maintain for investment advisors and their representatives.

7. The Record can be expunded upon entry of an Order by this honorable Court directing expungement pursuant to its inherent equitable authority.

8. As the Record was submitted pursuant to California reporting requirements, DFPI is the appropriate party to this action.

9. Based on the facts and circumstances known to DFPI at this time, DFPI does not oppose expungement relief.

10. Accordingly, the Parties request that the Court issue an order in the form of the Proposed Order attached hereto directing that the Record be expunded and that this matter be dismissed with prejudice.

11. No Party will be prejudiced in any way by the entry of the requested Order.

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1	12. The Parties understand and agree that DFPI enters this Stipulation solely based upon		
2	information provided by Krieger. DFPI may take further action, including withholding approval for		
3	FINRA's expungement of the Record(s), if DFPI discovers that Krieger withheld or misrepresented		
4	information used for and relied on in this Stipulation.		
5	13. The Parties hereby agree to bear their own respective attorneys' fees, costs, and expenses		
6	incurred in connection with this action.		
7	14. The Parties further agree to toll the deadline for DFPI to file a pleading responsive to the		
8	Complaint pending entry of the stipulated Order.		
9	AGREED AND STIPULATED TO:		
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11	Dated: January 22, 2024 By:		
12		Christie Gaumer, Esq. Attorney for Plaintiff	
13		ROBERT MATTHEW KRIEGER	
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16	Dated: January 22, 2024	Mary Ann Smith, Esq.	
17		Attorney for Defendant Department of Financial Protection and Innovation	
18		Department of Financial Frotection and Innovation	
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	JOINT STIPULATION AND REQUEST FOR ENTRY OF ORDER OF EXPUNGEMENT AND DISMISSAL; [PROPOSED] ORDER THEREON		