

1 1. On January 3, 2024, Krieger filed his Complaint for Expungement in Equitable Relief
2 (Complaint). The Complaint was timely filed and served on DFPI on January 12, 2024.

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

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

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

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

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

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

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

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

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

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

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12. The Parties understand and agree that DFPI enters this Stipulation solely based upon information provided by Krieger. DFPI may take further action, including withholding approval for FINRA’s expungement of the Record(s), if DFPI discovers that Krieger withheld or misrepresented information used for and relied on in this Stipulation.

13. The Parties hereby agree to bear their own respective attorneys’ fees, costs, and expenses incurred in connection with this action.

14. The Parties further agree to toll the deadline for DFPI to file a pleading responsive to the Complaint pending entry of the stipulated Order.

AGREED AND STIPULATED TO:

Dated: January 22, 2024

By: _____
Christie Gaumer, Esq.
Attorney for Plaintiff
ROBERT MATTHEW KRIEGER

Dated: January 22, 2024

Mary Ann Smith, Esq.
Attorney for Defendant
Department of Financial Protection and Innovation