



IAPD Report

GREGORY KENT WOMACK

CRD# 1858242

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When communicating online or investing with any professional, make sure you know who you're dealing with. [Imposters](#) might link to sites like BrokerCheck from [phishing](#) or similar scam websites, or through [social media](#), trying to steal your personal information or your money.

Please contact FINRA with any concerns.



IAPD Information About Representatives

IAPD offers information on all current-and many former representatives. Investors are strongly encouraged to use IAPD to check the background of representatives before deciding to conduct, or continue to conduct, business with them.

What is included in a IAPD report?

IAPD reports for individual representatives include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards.

It is important to note that the information contained in an IAPD report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

Where did this information come from?

The information contained in IAPD comes from the Investment Adviser Registration Depository (IARD) and FINRA's Central Registration Depository, or CRD, (see more on CRD below) and is a combination of:

- information the states require representatives and firms to submit as part of the registration and licensing process, and
- information that state regulators report regarding disciplinary actions or allegations against representatives.

How current is this information?

Generally, representatives are required to update their professional and disciplinary information in IARD within 30 days.

Need help interpreting this report?

For help understanding how to read this report, please consult NASAA's IAPD Tips page <http://www.nasaa.org/IAPD/IARReports.cfm>

What if I want to check the background of an Individual Broker or Brokerage Firm?

To check the background of an Individual Broker or Brokerage firm, you can search for the firm or individual in IAPD. If your search is successful, click on the link provided to view the available licensing and registration information in FINRA's BrokerCheck website.

Are there other resources I can use to check the background of investment professionals?

It is recommended that you learn as much as possible about an individual representative or Investment Adviser firm before deciding to work with them. Your state securities regulator can help you research individuals and certain firms doing business in your state. The contact information for state securities regulators can be found on the website of the North American Securities Administrators Association <http://www.nasaa.org>



Report Summary

GREGORY KENT WOMACK (CRD# 1858242)

The report summary provides an overview of the representative's professional background and conduct. The information contained in this report has been provided by the representative, investment adviser and/or securities firms, and/or securities regulators as part of the states' investment adviser registration and licensing process. The information contained in this report was last updated by the representative, a previous employing firm, or a securities regulator on **04/13/2023**.

CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	WOMACK INVESTMENT ADVISERS, INC	CRD# 118081	04/06/2000

QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **5** jurisdiction(s).

Is this representative currently Inactive or Suspended with any regulator? **No**

Note: Not all jurisdictions require IAR registration or may have an exemption from registration.

Additional information including this individual's qualification examinations and professional designations is available in the Detailed Report.

REGISTRATION HISTORY

This representative was previously registered with the following firm(s):

	FIRM	CRD#	LOCATION	REGISTRATION DATES
IA	TRINITY CAPITAL ASSET ADVISORS, LLC	150828	EDMOND, OK	01/23/2013 - 11/28/2017
IA	TRINITY CAPITAL ASSET ADVISORS, LLC	150828	EDMOND, OK	02/09/2010 - 12/31/2012
B	CAMBRIDGE INVESTMENT RESEARCH, INC.	39543	EDMOND, OK	01/03/2007 - 12/31/2009

For additional registration and employment history details as reported by the individual, refer to the Registration and Employment History section of the Detailed Report.

DISCLOSURE INFORMATION

Disclosure events include certain criminal charges and convictions, formal investigations and disciplinary actions initiated by regulators, customer disputes and arbitrations, and financial disclosures such as bankruptcies and unpaid judgments or liens.

Are there events disclosed about this representative?

Yes

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Civil Event	1



Qualifications

REGISTRATIONS

This section provides the SRO, states and U.S. territories in which the representative is currently registered and licensed, the category of each registration, and the date on which the registration becomes effective. This section also provides, for each firm with which the representative is currently employed, the address of each location where the representative works.

This individual is currently registered with **5** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

Employment 1 of 1

Firm Name: **WOMACK INVESTMENT ADVISERS, INC**

Main Address: 1366 E 15TH ST
EDMOND, OK 73013

Firm ID#: 118081

	Regulator	Registration	Status	Date
IA	California	Investment Adviser Representative	Approved	04/08/2016
IA	Illinois	Investment Adviser Representative	Approved	05/07/2012
IA	Indiana	Investment Adviser Representative	Approved	05/07/2012
IA	Oklahoma	Investment Adviser Representative	Approved	04/06/2000
IA	Texas	Investment Adviser Representative	Approved	01/01/2009

Branch Office Locations

WOMACK INVESTMENT ADVISERS, INC

1366 E 15TH ST
EDMOND, OK 73013



Qualifications



PASSED INDUSTRY EXAMS

This section includes all industry exams that the representative has passed. Under limited circumstances, a representative may attain registration after receiving an exam waiver based on a combination of exams the representative has passed and qualifying work experience. Likewise a new exam requirement may be grandfathered based on a representative's specific qualifying work experience. Exam waivers and grandfathering are not included below.

This individual has passed 2 principal/supervisory exams, 2 general industry/product exams, and 2 state securities law exams.

Principal/Supervisory Exams

	Exam	Category	Date
B	Municipal Fund Securities Principal Examination (S51)	Series 51	04/09/2004
B	General Securities Principal Examination (S24)	Series 24	05/22/1995

General Industry/Product Exams

	Exam	Category	Date
B	General Securities Representative Examination (S7)	Series 7	03/29/1994
B	Investment Company Products/Variable Contracts Representative Examination (S6)	Series 6	08/02/1988

State Securities Law Exams

	Exam	Category	Date
IA	Uniform Investment Adviser Law Examination (S65)	Series 65	03/09/2023
B	Uniform Securities Agent State Law Examination (S63)	Series 63	11/14/1988



PROFESSIONAL DESIGNATIONS

This section details that the representative has reported **0** professional designation(s).

No information reported.



Registration & Employment History

PREVIOUSLY REGISTERED WITH THE FOLLOWING FIRMS

This representative held registrations with the following firms:

	Registration Dates	Firm Name	ID#	Branch Location
IA	01/23/2013 - 11/28/2017	TRINITY CAPITAL ASSET ADVISORS, LLC	CRD# 150828	EDMOND, OK
IA	02/09/2010 - 12/31/2012	TRINITY CAPITAL ASSET ADVISORS, LLC	CRD# 150828	EDMOND, OK
B	01/03/2007 - 12/31/2009	CAMBRIDGE INVESTMENT RESEARCH, INC.	CRD# 39543	EDMOND, OK
IA	01/24/1995 - 12/31/2006	FINANCIAL NETWORK INVESTMENT CORPORATION	CRD# 13572	EDMOND, OK
B	11/07/1990 - 12/31/2006	FINANCIAL NETWORK INVESTMENT CORPORATION	CRD# 13572	EDMOND, OK
B	08/03/1988 - 11/13/1990	METLIFE SECURITIES INC.	CRD# 14251	SPRINGFIELD, MA
B	08/03/1988 - 11/13/1990	METROPOLITAN LIFE INSURANCE COMPANY	CRD# 4095	NEW YORK, NY

EMPLOYMENT HISTORY

Below is the representative's employment history for up to the last 10 years.

Employment Dates	Employer Name	Position	Investment Related	Employer Location
01/2022 - Present	OK SUN POWER, LLC	AFFILIATE	N	EDMOND, OK, United States
08/2019 - Present	GRENECO HOLDINGS, LLC	PARTNER	Y	EDMOND, OK, United States
08/2019 - Present	GRENECO MANAGEMENT, LLC	MANAGER	N	EDMOND, OK, United States
03/2018 - Present	RED BOOK PUBLISHING COMPANY, INC.	OFFICER	N	EDMOND, OK, United States
01/2017 - Present	GRENECO, LLC	AFFILIATE	Y	EDMOND, OK, United States
05/2004 - Present	FOUR LEAF CLOVER INVESTMENTS, LLC	MANAGING MEMBER	N	EDMOND, OK, United States
02/2003 - Present	WOMACK ADVISERS, LLC	MANAGING MEMBER	Y	EDMOND, OK, United States
05/2000 - Present	WOMACK INVESTMENT ADVISERS, INC.	PRESIDENT-IA REP	Y	EDMOND, OK, United States



Registration & Employment History

EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
01/2018 - 12/2021	DOWN TO EARTH THAI MASSAGE, INC	OFFICER	N	LA JOLLA, CA, United States
01/2014 - 12/2021	PRODUCTION BROKERS, LLC	PARTNER	N	EDMOND, OK, United States
01/2014 - 12/2021	TRIAD CAPITAL, LLC	PARTNER	N	Edmond, OK, United States
07/2010 - 11/2017	TRINITY GLOBAL GROWTH & INCOME FUND, L.P.	PARTNER	Y	EDMOND, OK, United States
07/2010 - 11/2017	TRINITY GLOBAL PARTNERS, LLC	MANAGING DIRECTOR	Y	EDMOND, OK, United States
12/2009 - 11/2017	TRINITY CAPITAL ASSET ADVISORS, LLC	MANAGING PARTNER	Y	EDMOND, OK, United States
12/2009 - 11/2017	TRINITY CAPITAL ASSET MANAGEMENT, LLC	MANAGING DIRECTOR	Y	EDMOND, OK, United States
12/2009 - 11/2017	TRINITY GOLD FUND, LP	PARTNER	Y	EDMOND, OK, United States
12/2014 - 01/2017	CONSERVATION PAYS, LLC	PARTNER	N	EDMOND, OK, United States
01/2010 - 10/2016	CONSTELLATION GROUP, INC.	OFFICER	N	EDMOND, OK, United States

OTHER BUSINESS ACTIVITIES

This section includes information, if any, as provided by the representative regarding other business activities the representative is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent, or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious, or fraternal and is recognized as tax exempt.

1). WOMACK ADVISERS, LLC - Investment Related. 1366 E 15th St, Edmond, OK 73013. Insurance products and sales; Managing Member, Independent Insurance Agent. Start date: 02/2003. Holds insurance licenses through this company. Hours: Less than 10 hrs/month during trading and non-trading hours.

2). FOUR LEAF CLOVER INVESTMENTS, LLC - Non-Investment Related. 1366 E 15th St, Edmond, OK 73013. Commercial real estate holdings; Managing Member. Start date: 05/2004. Serves as landlord for leased office spaces in a commercial building he owns. Hours: Approx. 5 hrs/month during non-trading hrs; 1 hr/month during trading hrs.

3). GRENECO HOLDINGS, LLC ("GreneCo Holdings"), GRENECO, LLC ("GreneCo"), and GRENECO MANAGEMENT, LLC ("GCM") - Investment Related. 1366 E 15th St, Edmond, OK 73013. GreneCo is a consulting firm that offers landowners services related to the development and marketing of land investment opportunities, including Reg D, Rule 506(c) investments (offered through non-affiliated registered broker-dealers). Mr. Womack is an affiliate of GreneCo through his partnership in its parent/holding company, GreneCo Holdings; he is also the Manager of GCM, which serves as the manager of GreneCo. Initial start date (GreneCo only): 01/2017; expanded/restructured date: 08/2019. Hours: Approx. 10 hrs/month during trading and non-trading hours.



Registration & Employment History



OTHER BUSINESS ACTIVITIES

- 4). RED BOOK PUBLISHING COMPANY, INC. - Non-Investment Related. 1366 E 15th St, Edmond, OK 73013. Publishes phone books and offers yellow pages advertising for rural communities in Central Oklahoma; Officer and Investor. Start date: 03/2018. Hours: Approx. 5 hrs/month or less during non-trading hours only.
- 5). OK SUN POWER, LLC - Non-Investment Related. 1366 E 15th St, Edmond, OK 73013. Develops real estate for the purpose of utilizing solar power in Oklahoma; Mr. Womack is an affiliate through his membership in its member, Skyeye, LLC; Start date: 01/2022. Hours: Less than 3 hrs/month during non-trading hours only.
- 6). GW RANCH & LODGE, LLC; G'DUB, LLC; and SKYEYE, LLC - Non-Investment Related. 1366 E 15th St, Edmond, OK 73013. Holds personal assets and property; Managing Member of each. Start dates: 03/2017, 06/2018/, 07/2017. Hours: These do not require any additional time or commitment.
- 7). GEMINI NATURAL RESOURCES, LLC - Non-Investment Related. 1366 E 15th St, Edmond, OK 73013. Holds passive mineral interests and oil & gases leases; Managing Member. Start date: 04/2014. Hours: Does not require any additional time or commitment.



Disclosure Summary

Disclosure Information

What you should know about reported disclosure events:

(1) Certain thresholds must be met before an event is reported to IARD, for example:

- A law enforcement agency must file formal charges before an Investment Adviser Representative is required to report a particular criminal event.;
- A customer dispute must involve allegations that an Investment Adviser Representative engaged in activity that violates certain rules or conduct governing the industry and that the activity resulted in damages of at least \$5,000.

(2) Disclosure events in IAPD reports come from different sources:

As mentioned in the "About IAPD" section on page 1 of this report, information contained in IAPD comes from Investment Adviser Representatives, firms and regulators. When more than one of these sources reports information for the same disclosure event, all versions of the event will appear in the IAPD report. The different versions will be separated by a solid line with the reporting source labeled.

(3) There are different statuses and dispositions for disclosure events:

- A disclosure event may have a status of *pending*, *on appeal*, or *final*.
 - A "pending" disclosure event involves allegations that have not been proven or formally adjudicated.
 - A disclosure event that is "on appeal" involves allegations that have been adjudicated but are currently being appealed.
 - A "final" disclosure event has been concluded and its resolution is not subject to change.
- A final disclosure event generally has a disposition of *adjudicated*, *settled* or *otherwise resolved*.
 - An "adjudicated" matter includes a disposition by (1) a court of law in a criminal or civil matter, or (2) an administrative panel in an action brought by a regulator that is contested by the party charged with some alleged wrongdoing.
 - A "settled" matter generally represents a disposition wherein the parties involved in a dispute reach an agreement to resolve the matter. Please note that Investment Adviser Representatives and firms may choose to settle customer disputes or regulatory matters for business or other reasons.
 - A "resolved" matter usually includes a disposition wherein no payment is made to the customer or there is no finding of wrongdoing on the part of the Investment Adviser Representative. Such matters generally involve customer disputes.

(4) You may wish to contact the Investment Adviser Representatives to obtain further information regarding any of the disclosure events contained in this IAPD report.



DISCLOSURE EVENT DETAILS

When evaluating this information, please keep in mind that some items may involve pending actions or allegations that may be contested and have not been resolved or proven. The event may, in the end, be withdrawn, dismissed, resolved in favor of the Investment Adviser Representative, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

This report provides the information exactly as it was reported to the Investment Adviser Registration Depository. Some of the specific data fields contained in the report may be blank if the information was not provided.

The following types of events are disclosed about this representative:

Type	Count
Regulatory Event	1
Civil Event	1

Regulatory Event

This disclosure event may include a final, formal proceeding initiated by a regulatory authority (e.g., a state securities agency, a federal regulator such as the Securities and Exchange Commission or the Commodities Futures Trading Commission, or a foreign financial regulatory body) for a violation of investment-related rules or regulations. This disclosure event may also include a revocation or suspension of an Investment Adviser Representative's authority to act as an attorney, accountant or federal contractor.

Disclosure 1 of 1

Reporting Source:	Regulator
Regulatory Action Initiated By:	Oklahoma Department of Securities
Sanction(s) Sought:	Civil and Administrative Penalty(ies)/Fine(s) Suspension
Date Initiated:	09/12/2022
Docket/Case Number:	ODS 20-150
URL for Regulatory Action:	https://www.securities.ok.gov/Enforcement/Orders/?SearchText=womack&SortID=Filed+Date&Display=All&SearchBtn=+
Employing firm when activity occurred which led to the regulatory action:	Womack Investment Advisers, Inc.
Product Type:	Investment Contract
Allegations:	Gregory Womack and an investment adviser under his control, Womack Investment Advisers, Inc., are alleged to have violated multiple provisions of the Oklahoma Uniform Securities Act of 2004 and the regulations promulgated thereunder, in connection with the offer and sale of interests in limited liability companies that conveyed conservation easements.
Current Status:	Final
Resolution:	Consent



Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?

Yes

Resolution Date:

03/02/2023

Sanctions Ordered:

Civil and Administrative Penalty(ies)/Fine(s)

Other: Gregory K. Womack was ordered not to transact business in and/or from Oklahoma as an investment adviser representative until he passes the Series 65. If he fails to pass the Series 65 on or before June 30, 2023, the Administrator of the OK Department of Securities shall revoke Mr. Womack's registration under the Act without advance notice or opportunity for a hearing.

For a period of 24 months from the issuance of the Final Order, Mr. Womack and Womack Investment Advisers shall be in a probationary status with the OK Department of Securities and shall maintain an external CCO or compliance consultant per the terms set forth in the Agreement.

Within 5 days of the issuance of the Final Order, Womack Investment Advisers and Mr. Womack shall amend their Forms ADV and U4, respectively, as set forth in the Final Order.

Requalification 1 of 1

Requalification Type:

Requalification by Exam

Length of time given to requalify:

June 30, 2023

Type of exam required :

Series 65

Has condition been satisfied:

Yes

Monetary Sanction 1 of 1

Monetary Related Sanction:

Civil and Administrative Penalty(ies)/Fine(s)

Total Amount:

\$200,000.00

Portion Levied against individual:

\$200,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual:

Was any portion of penalty waived?

No

Amount Waived:

Reporting Source:

Individual

Regulatory Action Initiated By:

Oklahoma Department of Securities

Sanction(s) Sought:

Civil and Administrative Penalty(ies)/Fine(s)
Suspension



Date Initiated:	09/12/2022
Docket/Case Number:	ODS 20-150
Employing firm when activity occurred which led to the regulatory action:	Womack Investment Advisers, Inc.
Product Type:	Investment Contract
Allegations:	<p>The Oklahoma Department of Securities (ODS) alleged that Gregory Womack and his investment adviser, Womack Investment Advisers, Inc (WIA), who is under his control, violated certain provisions of the Oklahoma Uniform Securities Act of 2004 by not properly disclosing Womack's affiliation with GreneCo, LLC, a company involved in land investment-related offerings, nor the compensation they received as a result of GreneCo's offerings on their respective RIA and IA disclosure documents and by recommending GreneCo's 2017 and 2018 offerings to their clients, of which ODS purports were not properly registered as securities and did not adequately disclose the use of proceeds in their respective marketing materials.</p>
Current Status:	Final
Resolution:	Consent
Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?	Yes
Resolution Date:	03/02/2023
Sanctions Ordered:	<p>Civil and Administrative Penalty(ies)/Fine(s)</p> <p>Other: Retake Series 65 Exam: Mr. Womack was ordered not to transact business in and/or from Oklahoma as an I.A. representative until passing the Series 65 exam by June 30, 2023. Failure to pass the exam by the stated date would result in the Oklahoma Department of Securities ("ODS") revoking Mr. Womack's registration under the act.</p> <p>24-month probationary status with ODS and engagement of an external, Oklahoma-based CCO or compliance consultant: Mr. Womack and his investment adviser, Womack Investment Advisers, Inc. ("WIA"), will be under probation with the ODS from March 2, 2023 to March 2, 2025, during which time they are required to engage and utilize the services of a compliance consultant who resides in Oklahoma and has been approved by ODS. Said consultant will adhere to the responsibilities outlined in the issued final agreement and is required to provide compliance-related summary reports to the ODS on a quarterly basis for the duration of the probationary period.</p> <p>Update Forms ADV and U4: where necessary and appropriate, WIA shall amend its Form ADV and Mr. Womack shall amend his Form U4 within 5 days to reflect the changes and/or disclosure updates set forth in the Final Order.</p>
Requalification 1 of 1	
Requalification Type:	Requalification by Exam
Length of time given to requalify:	June 30, 2023



Type of exam required : Series 65

Has condition been satisfied: Yes

Monetary Sanction 1 of 1

Monetary Related Sanction: Civil and Administrative Penalty(ies)/Fine(s)

Total Amount: \$200,000.00

Portion Levied against individual: \$200,000.00

Payment Plan:

Is Payment Plan Current:

Date Paid by individual: 03/27/2023

Was any portion of penalty waived? No

Amount Waived:

Broker Statement

Mr. Womack and his investment adviser, Womack Investment Advisers, Inc. ("WIA"), admitted no guilt as it relates to any allegations of dishonest and unethical practices with willful intent brought forth by the Oklahoma Department of Securities' (ODS) initial recommendation. Mr. Womack agreed to take responsibility for the alleged improper disclosure violations, an oversight that occurred due to misinformation by previous counsel regarding the type and filing requirements for the investments offered by one of his outside businesses, GreneCo, LLC, at the time in question, and took immediate action to rectify them upon discovery. There was no intent to defraud, manipulate, or deceive any of the investors in the GreneCo offerings or any clients of WIA. Additionally, all the investors, including the few WIA clients who invested in the offerings in question, received the full benefit they expected to receive by participating in said offerings, and no harm, fiscal or otherwise, was done to investors, WIA clients, or the trading public.

Mr. Womack and WIA reached an agreement with ODS regarding this matter and intend to fully comply with any and all requirements set forth in the Final Order.



Civil Event

This disclosure event involves an injunction issued by a foreign or domestic court in connection with investment-related activity, a finding by a domestic or foreign court of a violation of any investment-related statute or regulation, or an action dismissed by a domestic or foreign court pursuant to a settlement agreement.

Disclosure 1 of 1

Reporting Source:	Regulator
Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Relief Sought:	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement Injunction Monetary Penalty other than Fines
Date Court Action Filed:	08/08/2022
Product Type:	Real Estate Security
Type of Court:	Federal Court
Name of Court:	United States District Court for the Western District of Oklahoma
Location of Court:	Oklahoma
Docket/Case #:	5:22-cv-00673-F
Employing firm when activity occurred which led to the action:	Womack Investment Advisers, Inc.; GreneCo, LLC
Allegations:	<p>Plaintiff Securities and Exchange Commission files this Complaint against Defendants GreneCo, LLC ("GreneCo"), Gene D. Larson ("Larson"), Gregory K. Womack ("Womack") and Womack Investment Advisers, Inc. ("WIA") (collectively, "Defendants"), and respectfully shows the Court that from late 2017 through December 2018, GreneCo, Larson, and Womack raised approximately \$23.3 million from more than 250 investors in four unregistered securities offerings ("GreneCo Offerings") involving purported real estate investment opportunities. Each offering included three investment options, but GreneCo's marketing focused on a specific option that provided for the creation of charitable tax deductions through a conservation easement strategy. Larson and Womack co-owned and co-managed GreneCo. Larson was primarily responsible for identifying potential investors. The defendants solicited investors to purchase membership units in limited liability companies that would be managed by GreneCo. The membership units were securities, but the Defendants failed to register their offerings with the Commission and no registration exemption applied. In addition, Womack was the owner and control person of WIA, and he recommended one or more of the GreneCo offerings to WIA clients. In doing so, he failed to inform those clients that he would receive millions of dollars in management fees from investor funds from the GreneCo Offerings, including his portion of \$472,698 attributable to eight WIA investor clients. He and WIA also failed to inform WIA clients that WIA received at least \$160,000 directly from GreneCo as a result of the GreneCo offerings. Instead, WIA filed Part 2B of its annual Form ADV on March 9, 2018, which misleadingly represented that "WIA receives no compensation from a client's participation and does not charge the client a fee for this investment." Both Womack and WIA had an affirmative fiduciary duty to fully and fairly disclose the management fees paid to Womack and the compensation paid to WIA from GreneCo. As a result of the conduct described in the Complaint, Womack violated Section 5(a) and 5(c) of the Securities Act, and Section 206(2) of the Advisers Act.</p>
Current Status:	Final



Resolution: Judgment Rendered

Resolution Date: 08/15/2022

Sanctions Ordered or Relief Granted: Civil and Administrative Penalty(ies)/Fine(s)
Disgorgement
Injunction
Monetary Penalty other than Fines

Capacities 1 of 1

Capacities Affected: n/a

Duration: permanent

Start Date: 08/15/2022

End Date:

Monetary Sanction 1 of 3

Monetary Sanction: Monetary Fine

Total Amount: \$145,031.00

Portion against individual: 145031

Date Paid:

Portion Waived: No

Amount Waived:

Monetary Sanction 2 of 3

Monetary Sanction: Disgorgement

Total Amount: \$236,739.00

Portion against individual: 236739

Date Paid:

Portion Waived: No

Amount Waived:

Monetary Sanction 3 of 3

Monetary Sanction: prejudgment interest on disgorgement

Total Amount: \$48,170.00

Portion against individual: 48170

Date Paid:

Portion Waived: No

Amount Waived:

Regulator Statement

On August 15, 2022, a final judgment was entered, by consent, against Gregory Kent Womack wherein he was permanently restrained and enjoined from violating Section 5 of the Securities Act of 1933 and permanently restrained and enjoined from violating Section 206(2) of the Investment Advisers Act of 1940. Womack is also liable for disgorgement of \$236,739, representing net profits gained as a result of the conduct alleged in the Complaint, together with prejudgment interest thereon in the amount of \$48,170, and a civil penalty in the amount \$145,031.

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Reporting Source: Individual



Initiated By:	UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Relief Sought:	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement Injunction Monetary Penalty other than Fines
Date Court Action Filed:	08/08/2022
Date Notice/Process Served:	08/08/2022
Product Type:	Real Estate Security
Type of Court:	Federal Court
Name of Court:	United States District Court for the Western District of Oklahoma
Location of Court:	Oklahoma
Docket/Case #:	5:22-cv-00673-F
Employing firm when activity occurred which led to the action:	Womack Investment Advisers, Inc.; GreneCo, LLC
Allegations:	The SEC filed a complaint in the U.S. District Court for the Western District of Oklahoma alleging that GreneCo, LLC and its owners, Gene Larson and Gregory K. Womack, raised a total of approx. \$23.3 million in 2017 and 2018 through four different real estate securities offerings, involving conservation easements, that they failed to register with the SEC, thus, violating the securities registration provisions of Section 5 of the Securities Act of 1933. Additionally, the complaint alleged that Womack and his investment adviser, Womack Investment Advisers, Inc (WIA), failed to disclose compensation received from eight WIA clients who invested in said offerings, and that WIA's annual disclosures at the time failed to disclose compensation it received from GreneCo, thus, creating a conflict of interest, which Womack and WIA were required to disclose to their clients per the antifraud provisions of Section 206(2) of the Investment Advisers Act of 1940.
Current Status:	Final
Resolution:	Judgment Rendered
Resolution Date:	08/15/2022
Sanctions Ordered or Relief Granted:	Civil and Administrative Penalty(ies)/Fine(s) Disgorgement Injunction Monetary Penalty other than Fines
Capacities 1 of 2	
Capacities Affected:	Section 206(2) of the Investment Advisers Act of 1940
Duration:	Permanent
Start Date:	08/15/2022
End Date:	
Capacities 2 of 2	
Capacities Affected:	Section 5 of the Securities Act of 1933
Duration:	Permanent
Start Date:	08/15/2022
End Date:	

**Monetary Sanction 1 of 3****Monetary Sanction:** Monetary Fine**Total Amount:** \$1,118,790.00**Portion against individual:** 145031**Date Paid:** 09/16/2022**Portion Waived:** No**Amount Waived:****Monetary Sanction 2 of 3****Monetary Sanction:** Interest:Prejudgement-Womack \$48,170; WIA \$32,609.Postjudgement-GreeneCo\$1,191.55; Larson\$119.17; Womack \$1,236.34; WIA \$2,043.31**Total Amount:** \$85,369.37**Portion against individual:** 49406.34**Date Paid:** 09/16/2022**Portion Waived:** No**Amount Waived:****Monetary Sanction 3 of 3****Monetary Sanction:** Disgorgement**Total Amount:** \$396,739.00**Portion against individual:** 236739**Date Paid:** 09/16/2022**Portion Waived:** No**Amount Waived:****Broker Statement**

During its first two years, GreeneCo, LLC and its owners, Greg Womack and Gene Larson, were instructed by previous counsel that their private offerings, related to land investments that were ultimately donated into conservation easements, were not securities, and therefore, neither a securities registration nor an exemption was necessary. Since being made aware of this misinformation in 2019, GreeneCo has been offering securities under exemption from the registration requirements of the Securities Act of 1933. Because Mr. Womack is also an RIA, the SEC felt the language in his RIA disclosure documents, related to his involvement in and compensation from GreeneCo, at the time in question should have been clearer. However, although Womack did receive a portion of the management fees from the GreeneCo offerings, which included funds from investments made by a few WIA clients who participated in the offerings, WIA and Womack did not receive any advisory fees for their clients' participation in the GreeneCo offerings as alleged by the SEC. Additionally, payments made directly to WIA from GreeneCo were documented reimbursed expenses for office related overhead charges and not for management fees as purported by the SEC. Womack and Larson, owner of WIA and owners of GreeneCo, respectively, admitted no guilt as it relates to the alleged SEC charges and agreed to settle their complaint to avoid protracted and expensive litigation. Of note, the investors in the 2017 and 2018 offerings in question suffered no harm and received all the benefits they expected by participating in the offerings, and as of the final judgment date of 8/15/22, no investors have suffered any losses from participating in said offerings. Additionally, the settled judgment allows GreeneCo to continue to offer investments to qualified investors and Womack and WIA to continue offering investment adviser services to their clients without censure or restriction.



End of Report

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