



## IAPD Report

# WILLIAM W LEBOEUF

CRD# 2464080

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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

### WILLIAM W LEBOEUF (CRD# 2464080)

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 **01/09/2025**.

### CURRENT EMPLOYERS

	Firm	CRD#	Registered Since
IA	COMPOUND PLANNING, INC.	CRD# 171787	05/18/2022

### QUALIFICATIONS

This representative is currently registered in **0** SRO(s) and **2** 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	ONE RESOURCE GROUP PRIVATE ADVISOR GROUP	306235	Beavercreek, OH	12/13/2019 - 06/01/2020
B	CETERA ADVISOR NETWORKS LLC	13572	BEAVERCREEK, OH	03/28/2019 - 12/05/2019
IA	CETERA ADVISOR NETWORKS LLC	13572	BEAVERCREEK, OH	03/28/2019 - 12/05/2019

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	2
Termination	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 **2** jurisdiction(s) and **0** SRO(s) through his or her employer(s).

#### Employment 1 of 1

Firm Name: **COMPOUND PLANNING, INC.**  
Main Address: 115 BROADWAY  
5TH FLOOR  
NEW YORK, NY 10006  
Firm ID#: 171787

	Regulator	Registration	Status	Date
<b>IA</b>	Louisiana	Investment Adviser Representative	Approved	02/06/2025
<b>IA</b>	Ohio	Investment Adviser Representative	Approved	05/18/2022

#### Branch Office Locations

**COMPOUND PLANNING, INC.**  
3033 Kettering Boulevard  
STE 103  
Dayton, OH 45439



## 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 0 principal/supervisory exams, 3 general industry/product exams, and 2 state securities law exams.**

#### Principal/Supervisory Exams

Exam	Category	Date
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No information reported.

#### General Industry/Product Exams

Exam	Category	Date
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Securities Industry Essentials Examination (SIE)	SIE	10/01/2018
Futures Managed Funds Examination (S31)	Series 31	06/30/1994
General Securities Representative Examination (S7)	Series 7	06/15/1994

#### State Securities Law Exams

Exam	Category	Date
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Uniform Investment Adviser Law Examination (S65)	Series 65	07/26/2001
Uniform Securities Agent State Law Examination (S63)	Series 63	06/21/1994

### 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	12/13/2019 - 06/01/2020	ONE RESOURCE GROUP PRIVATE ADVISOR GROUP	CRD# 306235	Beavercreek, OH
B	03/28/2019 - 12/05/2019	CETERA ADVISOR NETWORKS LLC	CRD# 13572	BEAVERCREEK, OH
IA	03/28/2019 - 12/05/2019	CETERA ADVISOR NETWORKS LLC	CRD# 13572	BEAVERCREEK, OH
IA	09/08/2009 - 03/29/2019	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	MIAMISBURG, OH
B	09/02/2009 - 03/29/2019	MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED	CRD# 7691	MIAMISBURG, OH
B	06/01/2009 - 09/18/2009	MORGAN STANLEY SMITH BARNEY	CRD# 149777	DAYTON, OH
IA	06/01/2009 - 09/18/2009	MORGAN STANLEY SMITH BARNEY LLC	CRD# 149777	DAYTON, OH
IA	09/18/2002 - 06/01/2009	CITIGROUP GLOBAL MARKETS INC.	CRD# 7059	DAYTON, OH
B	08/30/2002 - 06/01/2009	CITIGROUP GLOBAL MARKETS INC.	CRD# 7059	DAYTON, OH
B	02/16/2001 - 09/09/2002	LEHMAN BROTHERS INC.	CRD# 7506	NEW YORK, NY
B	06/16/1994 - 03/07/2001	DEAN WITTER REYNOLDS INC.	CRD# 7556	PURCHASE, 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
04/2022 - Present	Atomi Financial Group	Investment Advisor Representative	Y	Dayton, OH, United States
04/2021 - Present	Carillon Advisors, LLC	Investment Adviser Representative	Y	BEAVERCREEK, OH, United States
06/2020 - Present	Emerald Investment Partners, LLC	Investment Advisor Representative	Y	Cary, NC, United States
03/2019 - Present	CARILLON ADVISORS	Managing Director	Y	BEAVERCREEK, OH, United States



### Registration & Employment History

#### EMPLOYMENT HISTORY

Employment Dates	Employer Name	Position	Investment Related	Employer Location
03/2011 - Present	YMCA	DIRECTOR	N	DAYTON, OH, United States
05/2000 - Present	WESTERN GOLF ASSOCIATION - CADDIE SCHOLARSHIP FUND	DIRECTOR	N	CHICAGO, IL, United States
12/2010 - 05/2020	ORG Private Advisors Group, LLC	Investment Advisor	Y	Roanoke, IN, United States
03/2019 - 11/2019	CETERA ADVISOR NETWORKS	REGISTERED REP/ INVESTMENT ADVISOR REP	Y	EL SEGUNDO, CA, United States
08/2011 - 03/2019	BANK OF AMERICA, N.A.	SENIOR FINANCIAL ADVISOR	Y	MIAMISBURG, OH, United States
09/2009 - 03/2019	MERRILL LYNCH	FINANCIAL ADVISOR	Y	MIAMISBURG, OH, 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. NAME OF OTHER BUSINESS: YMCA  
 INVESTMENT RELATED: NO  
 ADDRESS: 316 N WILKINSON STREET DAYTON OH  
 NATURE OF BUSINESS: NON-PROFIT  
 START DATE: 05/2006  
 POSITION/TITLE/RELATIONSHIP: DIRECTOR  
 APX NUMBER OF HOURS PER WEEK: 2  
 APX NUMBER OF HOURS DURING TRADING HOURS: MINIMAL  
 BRIEF DESCRIPTION OF DUTIES: DIRECTOR

2. NAME OF OTHER BUSINESS: WESTERN GOLF ASSOCIATION - CADDIE SCHOLARSHIP FUND  
 INVESTMENT RELATED: NO  
 ADDRESS: ONE BRIAR ROAD CHICAGO, IL 60029  
 NATURE OF BUSINESS: ASSOCIATION  
 START DATE: 05/2000  
 POSITION/TITLE/RELATIONSHIP: DIRECTOR  
 APX NUMBER OF HOURS PER WEEK: 2  
 APX NUMBER OF HOURS DURING TRADING HOURS: MINIMAL  
 BRIEF DESCRIPTION OF DUTIES: DIRECTOR - RAISE AWAREANESS

3. NAME OF OTHER BUSINESS: CONSUMER OPTIX  
 INVESTMENT RELATED: NO  
 ADDRESS: 38 S. Main St., Ste. 297, Dayton, OH 45402;  
 NATURE OF BUSINESS: Software as a service company supporting front end sales agents in the life insurance business.



## Registration & Employment History



### OTHER BUSINESS ACTIVITIES

START DATE: 12/2019

APX NUMBER OF HOURS PER WEEK: 5

APX NUMBER OF HOURS DURING TRADING HOURS: 5

POSITION/TITLE/RELATIONSHIP: Board of Directors

BRIEF DESCRIPTION OF DUTIES: Guiding company in policies and strategy related to product development, target markets and implementation.

4. NAME OF OTHER BUSINESS: ACCELERATE CAPITAL PARTNERS, LLC

INVESTMENT RELATED: NO

ADDRESS:

NATURE OF BUSINESS:

START DATE: 08/2019

POSITION/TITLE/RELATIONSHIP: MEMBER

APX NUMBER OF HOURS PER WEEK: MINIMAL

APX NUMBER OF HOURS DURING TRADING HOURS: MINIMAL

BRIEF DESCRIPTION OF DUTIES: MANAGER

5. Managing Director; Carillon Advisors Insurance Agency; Investment Related: Yes; Location: 75 Harbert Dr., Beavercreek, OH 45440; Description of the business: Carillon Advisors, LLC is also a Life and Health Licensed Insurance Agency with appointments with many carriers and in many states.; Responsibilities Duties: Market and place term life insurance and other life insurance when appropriate in a financial plan.; Start date with business: 2021-01-01; Hours devoted to business during trading hours: 10; Hours devoted to business outside trading hours: 10; Percentage of total yearly compensation expected to be derived from the business: 25;



## 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	2
Termination	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 2

<b>Reporting Source:</b>	Regulator
<b>Regulatory Action Initiated By:</b>	Ohio
<b>Sanction(s) Sought:</b>	Suspension
<b>Date Initiated:</b>	04/19/2022
<b>Docket/Case Number:</b>	22-007
<b>URL for Regulatory Action:</b>	<a href="https://apps2.com.ohio.gov/secu/FinalOrders/">https://apps2.com.ohio.gov/secu/FinalOrders/</a>
<b>Employing firm when activity occurred which led to the regulatory action:</b>	Cetera Adviser Networks LLC, CRD No. 13572
<b>Product Type:</b>	Other: Private securities
<b>Allegations:</b>	Mr. LeBoeuf engaged in outside business activities and private securities transactions without disclosing to or obtaining approval from Cetera
<b>Current Status:</b>	Final
<b>Resolution:</b>	Order
<b>Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?</b>	No
<b>Resolution Date:</b>	05/18/2022



**Sanctions Ordered:** Suspension  
Other: LeBoeuf is subject to a Heightened Supervision Agreement with Atomi for a period of 1 year

#### Sanction 1 of 1

**Sanction Type:** Suspension

**Capacities Affected:** RA

**Duration:** 1 year

**Start Date:** 05/17/2021

**End Date:** 05/17/2022

#### Regulator Statement

The Division finds that LeBoeuf is not "of good business repute" as that term is used in ORC sections 1707.161(E), 1707.19(A)(1)(a) and OAC rules 1301:6-3-19(D)(7), (8), and (9); pursuant to ORC section 1707.161(E), LeBoeuf's investment adviser representative license application shall be APPROVED, and pursuant to ORC section 1707.19, the investment adviser representative license of LeBoeuf is hereby SUSPENDED for a period of twelve (12) months, with the entirety of the suspension having been served immediately prior to the issuance of this Order.

#### Disclosure 2 of 2

**Reporting Source:** Regulator

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:**

**Date Initiated:** 11/23/2021

**Docket/Case Number:** [2019064823601](#)

**Employing firm when activity occurred which led to the regulatory action:** CETERA ADVISOR NETWORKS LLC; MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED

**Product Type:** Promissory Note  
Real Estate Security

**Allegations:** Without admitting or denying the findings, LeBoeuf consented to the sanctions and to the entry of findings that he participated in private securities transactions without providing prior written notice to, and receiving written approval from, his member firms. The findings stated that LeBoeuf used his personal email to solicit his firm client, a family member, to invest in a pooled real estate investment fund. In addition, LeBoeuf solicited investors, including firm clients, to invest in a convertible promissory note issued by a software company and sent emails introducing the investment and recommending investment amounts to his investors. LeBoeuf also formed a limited liability company to facilitate investments in the software company and ensured the investors' funds were wired to the company. Three firm clients invested a total of \$750,000 in the software company's convertible promissory notes. LeBoeuf did not receive selling compensation from any of the investments in the real estate fund or software company. In addition, LeBoeuf falsely attested on annual compliance questionnaires that he had not used a personal device to communicate with clients using software not available from the firm. The findings also stated that LeBoeuf engaged in an outside business activity (OBA) without providing prior written notice to the firm. While associated with the firm, LeBoeuf filed articles of incorporation for a limited liability company with the Ohio Secretary of State. LeBoeuf was the authorized signor for



the company's bank account and was identified in the company's operating agreement as the member, sole manager, and partnership representative for tax purposes. The findings also included that, in the course of soliciting potential investors in the software company, LeBoeuf's communications did not provide potential investors with the required sound basis to evaluate all of the relevant facts with respect to the potential investment. LeBoeuf emailed a company presentation to investors, including several firm customers, that did not adequately address the illiquidity of the proposed investment or the possibility of investment loss. Further, the presentation failed to identify the assumptions, limitations, impediments, and restrictions that could inhibit the achievement of a yearly revenue forecast.

**Current Status:**

Final

**Resolution:**

Acceptance, Waiver & Consent(AWC)

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

No

**Resolution Date:**

11/23/2021

**Sanctions Ordered:**

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

**If the regulator is the SEC, CFTC, or an SRO, did the action result in a finding of a willful violation or failure to supervise?**

No

**(1) willfully violated any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board, or to have been unable to comply with any provision of such Act, rule or regulation?**



**(2) willfully aided, abetted, counseled, commanded, induced, or procured the violation by any person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any of such Acts, or any of the rules of the Municipal Securities Rulemaking Board? or**

**(3) failed reasonably to supervise another person subject to your supervision, with a view to preventing the violation by such person of any provision of the Securities Act of 1933, the Securities Exchange Act of 1934, the Investment Advisers Act of 1940, the Investment Company Act of 1940, the Commodity Exchange Act, or any rule or regulation under any such Acts, or any of the rules of the Municipal Securities Rulemaking Board?**

**Sanction 1 of 1**

<b>Sanction Type:</b>	Suspension
<b>Capacities Affected:</b>	All Capacities
<b>Duration:</b>	12 Months
<b>Start Date:</b>	12/06/2021
<b>End Date:</b>	12/05/2022

**Monetary Sanction 1 of 1**

<b>Monetary Related Sanction:</b>	Civil and Administrative Penalty(ies)/Fine(s)
<b>Total Amount:</b>	\$12,500.00
<b>Portion Levied against individual:</b>	\$12,500.00
<b>Payment Plan:</b>	Deferred
<b>Is Payment Plan Current:</b>	
<b>Date Paid by individual:</b>	
<b>Was any portion of penalty waived?</b>	No



**Amount Waived:**

.....

**Reporting Source:** Individual

**Regulatory Action Initiated By:** FINRA

**Sanction(s) Sought:**

**Date Initiated:** 11/23/2021

**Docket/Case Number:** [2019064823601](#)

**Employing firm when activity occurred which led to the regulatory action:** CETERA ADVISOR NETWORKS LLC; MERRILL LYNCH, PIERCE, FENNER & SMITH INCORPORATED

**Product Type:** Promissory Note  
Real Estate Security

**Allegations:** Without admitting or denying the findings, LeBoeuf consented to the sanctions and to the entry of findings that he participated in private securities transactions without providing prior written notice to, and receiving written approval from, his member firms. The findings stated that LeBoeuf used his personal email to solicit his firm client, a family member, to invest in a pooled real estate investment fund. In addition, LeBoeuf solicited investors, including firm clients, to invest in a convertible promissory note issued by a software company and sent emails introducing the investment and recommending investment amounts to his investors. LeBoeuf also formed a limited liability company to facilitate investments in the software company and ensured the investors' funds were wired to the company. Three firm clients invested a total of \$750,000 in the software company's convertible promissory notes. LeBoeuf did not receive selling compensation from any of the investments in the real estate fund or software company. In addition, LeBoeuf falsely attested on annual compliance questionnaires that he had not used a personal device to communicate with clients using software not available from the firm. The findings also stated that LeBoeuf engaged in an outside business activity (OBA) without providing prior written notice to the firm. While associated with the firm, LeBoeuf filed articles of incorporation for a limited liability company with the Ohio Secretary of State. LeBoeuf was the authorized signor for the company's bank account and was identified in the company's operating agreement as the member, sole manager, and partnership representative for tax purposes. The findings also included that, in the course of soliciting potential investors in the software company, LeBoeuf's communications did not provide potential investors with the required sound basis to evaluate all of the relevant facts with respect to the potential investment. LeBoeuf emailed a company presentation to investors, including several firm customers, that did not adequately address the illiquidity of the proposed investment or the possibility of investment loss. Further, the presentation failed to identify the assumptions, limitations, impediments, and restrictions that could inhibit the achievement of a yearly revenue forecast.

**Current Status:** Final

**Resolution:** Acceptance, Waiver & Consent(AWC)



**Does the order constitute a final order based on violations of any laws or regulations that prohibit fraudulent, manipulative, or deceptive conduct?** No

**Resolution Date:** 11/23/2021

**Sanctions Ordered:** Civil and Administrative Penalty(ies)/Fine(s)  
Suspension

**Sanction 1 of 1**

**Sanction Type:** Suspension

**Capacities Affected:** All Capacities

**Duration:** 12 months

**Start Date:** 12/06/2021

**End Date:** 12/05/2022

**Monetary Sanction 1 of 1**

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

**Total Amount:** \$12,500.00

**Portion Levied against individual:** \$12,500.00

**Payment Plan:** Deferred

**Is Payment Plan Current:**

**Date Paid by individual:**

**Was any portion of penalty waived?** No

**Amount Waived:**

**Broker Statement**

On November 23, 2021 William LeBoeuf (Respondent) filed a letter of Acceptance, Waiver and Consent in a matter pursuant to FINRA Rule 9216 for the purpose of proposing a settlement of the alleged rule violations described below. This AWC is submitted on the condition that, if accepted, FINRA will not bring any future actions against Respondent alleging violations based on the same factual findings described in this AWC.

In 2017, while associated with Merrill Lynch, Respondent participated in a private securities transaction by soliciting a firm client, a family member of the Respondent, to invest in a pooled real estate investment fund. Additionally, in 2019 while associated with Cetera, Respondent participated in a private securities transaction by facilitating investments of three Cetera customers in a convertible promissory note issued by Company B, a software company. Respondent's customers at ML and Cetera invested a total of \$1 million in the two securities. Respondent participated in these private securities transactions without notifying and receiving prior written approval from ML or Cetera. As a result of the conduct, Respondent violated FINRA Rules 3280 and 2010.

In 2019, Respondent formed and became the sole manager of an LLC that he created for the purpose of pooling and making investments in the convertible promissory note issued by Company B. Respondent did not provide Cetera with notice or obtain prior approval before engaging in this outside business activity. As



a result, he violated FINRA rules 3270 and 2010.

Additionally, in the course of facilitating investments in Company B, Respondent emailed a presentation to potential investors and did not clearly explain the applicable risks to investors in violation of FINRA rules 2210(d)(1)(A) and 2010.

Respondent did not receive selling compensation in these matters, and there were no client complaints related to these matters.

FINRA has accepted the AWC, and a instituted a suspension of 12 months, beginning 6Dec2021 and ending 5Dec2022, from participating in the securities industry with a FINRA firm and levied a \$12,500 fine in order to be reinstated with a FINRA firm.;



## Termination

This disclosure event involves a situation where the Investment Adviser Representative voluntarily resigned, was discharged or was permitted to resign after allegations were made that accused the Investment Adviser Representative of violating investment-related statutes, regulations, rules or industry standards of conduct; fraud or the wrongful taking of property; or failure to supervise in connection with investment-related statutes, regulations, rules or industry standards of conduct.

### Disclosure 1 of 1

**Reporting Source:** Firm  
**Firm Name:** CETERA ADVISOR NETWORKS  
**Termination Type:** Discharged  
**Termination Date:** 11/21/2019  
**Allegations:** REGISTERED REPRESENTATIVE VIOLATED FIRM POLICIES BY PARTICIPATING IN PRIVATE SECURITIES TRANSACTIONS WITHOUT PRIOR FIRM APPROVAL.  
**Product Type:** Promissory Note

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**Reporting Source:** Individual  
**Firm Name:** Cetera Advisors Networks  
**Termination Type:** Discharged  
**Termination Date:** 11/21/2019  
**Allegations:** Mr. LeBoeuf was terminated by Cetera Advisors for violating Firm policies by participating in private securities transactions without proper firm approval.  
**Product Type:** No Product



## End of Report

This page is intentionally left blank.