

**NASD
OFFICE OF HEARING OFFICERS**

DEPARTMENT OF ENFORCEMENT,

Complainant

v.

**WILLIAM D. MATTES, SR.,
Registered Representative
(CRD No. 3251539)**

Mattes

**Disciplinary Proceeding
No. 20060059367**

Hearing Officer

COMPLAINT

The Department of Enforcement alleges:

1. William D. Mattes, Sr. ("Mattes") was registered as an Investment Company/Variable Contracts Products Representative with Chase Investment Services Corp. ("Member"), a member of NASD, between July 2005 and August 2006. Mattes is not currently registered with a NASD member. Mattes therefore is subject to the jurisdiction of the NASD, pursuant to Article V, Section 4 of NASD's By-Laws.

**CAUSE OF ACTION
Conversion of Customer's Funds
Violation of NASD Conduct Rule 2110**

2. The Department realleges and incorporates by reference paragraph 1 above.
3. During all relevant times, J.T. was a member of the public who maintained a checking account at the Member's bank affiliate.
4. During all times relevant hereto, Mattes also was an employee of the bank affiliate.

5. Between approximately April 24, 2006 and June 26, 2006, Mattes converted a total of \$3,900 from J.T. by creating an ATM card and using the ATM card to withdraw \$300 from J.T.'s checking and savings accounts at the Member's bank affiliate on 13 separate occasions, all without the knowledge or consent of J.T.

6. The above acts, practices and conduct constitute separate and distinct violations of NASD Conduct Rule 2110 by Mattes.

PRAYER FOR RELIEF

WHEREFORE, Complainant respectfully requests that the Panel:

- A. order that one or more of the sanctions provided under NASD Rule 8310(a), including monetary sanctions, be imposed; and
- B. order that Mattes bear such costs of proceeding as are deemed fair and appropriate under the circumstances in accordance with NASD Rule 8330.

Date: February 23, 2007

NASD DEPARTMENT OF ENFORCEMENT



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