

**FINANCIAL INDUSTRY REGULATORY AUTHORITY
OFFICE OF HEARING OFFICERS**

Department of Enforcement,

Complainant,

v.

Nana Kwame Kwakye-Bissah
CRD No. 7044974,

Respondent.

Disciplinary Proceeding
No. 2024083571501

COMPLAINT

The Department of Enforcement alleges:

SUMMARY

1. In October and November 2024, Respondent Nana Kwame Kwakye-Bissah failed to respond to requests for documents and information that FINRA made pursuant to FINRA Rule 8210 as part of FINRA’s investigation into whether Kwakye-Bissah falsified documents and converted customer funds. As a result, Kwakye-Bissah violated FINRA Rules 8210 and 2010.

RESPONDENT AND JURISDICTION

2. Kwakye-Bissah first registered with FINRA as an Investment Company and Variable Contracts Products Representative through his association with a member firm in January 2019.

3. From July 2023 to October 2024, Kwakye-Bissah was registered with FINRA as a General Securities Representative through his association with LPL Financial LLC (CRD No. 6413) (“LPL”).

4. On October 7, 2024, LPL filed a Uniform Termination Notice for Securities Industry Registration (“Form U5”) disclosing that the firm discharged Kwakye-Bissah because he:

Opened credit union account using customer’s personal information without customer’s knowledge or approval. Submitted electronic distribution request containing a non-genuine signature, in violation of Firm policy. Facilitated electronic distribution without customer approval, in violation of Firm policy.

5. Kwakye-Bissah has not been registered with FINRA since October 7, 2024.

6. Although Kwakye-Bissah is no longer registered or associated with a FINRA member, he remains subject to FINRA’s jurisdiction for purposes of this proceeding pursuant to Article V, Section 4 of FINRA’s By-Laws because (i) the Complaint was filed within two years after October 7, 2024, which was the effective date of termination of Kwakye-Bissah’s registration with LPL; and (ii) the Complaint charges Kwakye-Bissah with failing to respond to FINRA’s requests for information during the two-year period after the date on which he ceased to be registered or associated with a FINRA member.

CAUSE OF ACTION
Failure to Provide Documents and Information
(Violation of FINRA Rule 8210 and 2010)

7. Enforcement realleges and incorporates by reference all previous paragraphs.

8. FINRA Rule 8210(a)(1) provides that for the purpose of an investigation, complaint, examination, or proceeding authorized by the FINRA By-Laws or rules, FINRA staff shall have the right to require any person subject to FINRA’s jurisdiction to “provide information orally, in writing, or electronically ... with respect to any matter involved in the investigation, complaint, examination, or proceeding.”

9. FINRA Rule 8210(a)(2) provides that FINRA may “inspect and copy the books, records, and accounts of such member or person with respect to any matter involved in the investigation, complaint, examination, or proceeding that is in such member’s or person’s possession, custody, or control.”

10. FINRA Rule 8210(c) provides that “[n]o member or person shall fail to provide information ... pursuant to this Rule.”

11. FINRA Rule 8210(d) specifies that notice under Rule 8210 shall be deemed received by a currently or formerly registered person to whom it is directed by mailing or otherwise transmitting the notice to the last known residential address of the person as reflected in FINRA’s Central Registration Depository (“CRD”).

12. A violation of FINRA Rule 8210 is also a violation of FINRA Rule 2010, which requires associated persons to “observe high standards of commercial honor and just and equitable principles of trade” in the conduct of their business.

13. In October 2024, FINRA was investigating whether Kwakye-Bissah falsified documents and converted customer funds while he was associated with LPL.

14. On October 23, 2024, as part of its investigation, FINRA sent a request for documents and information pursuant to FINRA Rule 8210 (“First 8210 Request”) by first-class mail and certified mail to the address listed for Kwakye-Bissah in CRD (“Kwakye-Bissah’s CRD Address”).

15. On October 24, 2024, FINRA also sent a courtesy copy of the First 8210 Request to Kwakye-Bissah by email.

16. In the First 8210 Request, FINRA asked for Kwakye-Bissah’s written response to the allegations in the October 7, 2024 Form U5 and related documentary evidence.

17. The first-class mail copy of the First 8210 Request was not returned.
18. The certified mail copy of the First 8210 Request was marked “delivered, left with individual” on October 28, 2024 by USPS tracking.
19. Kwakye-Bissah’s response to the First 8210 Request was due on November 6, 2024.
20. Kwakye-Bissah did not provide any of the documents or information FINRA requested in response to the First 8210 Request nor did he respond in any manner to the First 8210 Request.
21. On November 7, 2024, after Kwakye-Bissah did not respond to the First 8210 Request, FINRA sent Kwakye-Bissah a second request for documents and information pursuant to FINRA Rule 8210 (“Second 8210 Request”) by first-class mail and certified mail to Kwakye-Bissah’s CRD Address.
22. FINRA also sent a courtesy copy of the Second 8210 Request to Kwakye-Bissah by email.
23. The information and documents requested in the Second 8210 Request were identical to those requested in the First 8210 Request.
24. Kwakye-Bissah’s response to the Second 8210 Request was due on November 21, 2024.
25. The first-class mail copy of the Second 8210 Request was not returned.
26. The certified mail copy of the Second 8210 Request was marked “unclaimed/being returned to sender.”
27. Kwakye-Bissah did not provide any of the documents or information FINRA requested in response to the First or Second 8210 Requests or respond to the requests in any way.

28. The information and documents FINRA requested were material to FINRA's investigation because they directly related to whether Kwakye-Bissah falsified customer information and converted customer funds.

29. Kwakye-Bissah's failure to provide the requested documents and information impeded FINRA's investigation into his potential misconduct.

30. By failing to respond to FINRA's requests for documents and information, Kwakye-Bissah violated FINRA Rules 8210 and 2010.

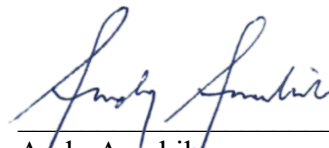
RELIEF REQUESTED

WHEREFORE, the Department of Enforcement respectfully requests that the Panel:

- A. make findings of fact and conclusions of law that Respondent committed the violations charged and alleged herein;
- B. order that one or more of the sanctions provided under FINRA Rule 8310(a), including monetary sanctions, be imposed; and
- C. order that Respondent bears such costs of proceeding as are deemed fair and appropriate under the circumstances in accordance with FINRA Rule 8330.

FINRA DEPARTMENT OF ENFORCEMENT

Date: March 27, 2025



Andy Amakihe
Senior Attorney
FINRA Department of Enforcement
10 Harborside Plaza
3 Second Street | Suite 900
Jersey City, NJ 07311
Phone: (212) 858-3904
E-mail: Andy.Amakihe@finra.org

Carlisle Overbey
Principal Counsel
FINRA Department of Enforcement
200 Liberty Street
New York, NY 10281
Phone: (646) 315-8520
Email: Carlisle.Overbey@finra.org

Jessica Brach
Director
FINRA Department of Enforcement
200 Liberty Street
New York, NY 10281
Phone: (646) 315-7348
Email: Jessica.Brach@finra.org