



**BEFORE THE COMMISSIONER OF COMMERCE AND INSURANCE
FOR THE STATE OF TENNESSEE**

IN RE ANTHONY R. BOOKMAN

)
)
)

TSD No.: 20-067

ORDER OF DENIAL

This Order of Denial issues as the result of the attached Petition for Order of Denial, submitted by the Tennessee Securities Division of the Tennessee Department of Commerce and Insurance (“Division”). The Assistant Commissioner finds that this action is in the public interest, necessary for the protection of investors, and consistent with the purposes fairly intended by the policies and provisions of the Tennessee Securities Act of 1980, as amended, Tenn. Code Ann. §§ 48-1-101 to 48-1-201 *et seq.* (“Tennessee Securities Act”). This Order of Denial results from the following Findings of Fact and Conclusions of Law.

FINDINGS OF FACT

1. Anthony R. Bookman (“Bookman”), CRD # 3185872, is a non-resident with an address on record with the Division of 820 N. Bishop Avenue, Dallas, TX 75208.
2. On September 16, 2020, Seaport Global Securities, LLC (“Seaport”) submitted an application on behalf of Bookman for registration with the Division to conduct business as a broker-dealer agent in Tennessee.
3. Perry Warden (“Warden”), Securities Examiner III with the Division, reviewed Bookman’s application and discovered that Bookman failed to disclose an administrative action against him, in his application.

4. On or about September 3, 2008, the State of Colorado Securities Commissioner entered a Final Cease and Desist Order (“Order”) against Bookman, ordering Bookman to immediately cease and desist from offering or selling securities in or from Colorado, and from otherwise violating the Colorado Securities Act.

5. The Order concluded that Bookman offered and sold unregistered securities; acted as an unlicensed broker-dealer or sales representative; and offered and sold securities in a fraudulent manner, in violation of the Colorado Securities Act.

6. On September 22, 2020, Warden issued a letter to Seaport asking why Bookman did not disclose the Order.

7. Instead of responding to the letter, Bookman attempted to withdraw his application on November 23, 2020.

8. Bookman’s application for registration was deemed complete on November 24, 2020.

CONCLUSIONS OF LAW

9. The Tennessee Securities Act places the responsibility for its administration with the Commissioner of the Department of Commerce and Insurance (“Commissioner”). The Division is the lawful agent through which the Commissioner discharges this responsibility pursuant to Tenn. Code Ann. § 48-1-115.

10. Tenn. Code Ann. § 48-1-115 and Tenn. Comp. R. & Regs. 0780-04-01-.04(1)(b)4. expressly empower the Assistant Commissioner to issue orders of effective registration, orders of denial, and other orders not involving any sanctions.

11. Tenn. Code Ann. § 48-1-112(a)(1), (a)(2)(A), (a)(2)(B), and (a)(2)(G) provides that the Commissioner may by order deny registration upon finding that the order is in the public

interest and necessary for the protection of investors; the applicant filed an application for registration which includes any untrue statement of a material fact or omits to state any material fact required to be stated therein or necessary to make the statements therein, in light of the circumstances under which they were made, not misleading; the applicant willfully violated or willfully failed to comply with any provision of the Act or any rule under the Act; or the applicant engaged in dishonest or unethical practices in the securities business.

12. Tenn. Comp. R. & Regs. 0780-04-03-.02(6)(a)19. states that failing to provide information requested by the Division pursuant to the Act or these Rules promulgated thereunder, shall be deemed dishonest or unethical business practices by an agent under Tenn. Code Ann. § 48-1-112(a)(2)(G).

13. The Findings of Fact demonstrate that Bookman filed an application for registration which includes an untrue statement of a material fact or omits to state a material fact required to be stated therein or necessary to make the statements therein, in light of the circumstances under which they were made, not misleading when he failed to disclose an administrative action against him in violation of Tenn. Code Ann. § 48-1-112(a)(2)(A) and (a)(2)(B).

14. The Findings of Fact show that applicant Bookman committed dishonest and unethical practices in the securities business when he acted as an unregistered agent and sold unregistered and fraudulent securities in Colorado, then failed to disclose the Colorado administrative action against him to the Division, and failed to respond to the Division's letter asking him why he failed to disclose the administrative action, in violation of Tenn. Comp. R. & Regs. 0780-04-03-.02(6)(a)19. and Tenn. Code Ann. § 48-1-112(a)(2)(A) and (a)(2)(G).

15. Bookman's conduct provides sufficient grounds for the denial of his application for registration as a broker-dealer agent pursuant to Tenn. Code Ann. § 48-1-112(a)(1), (a)(2)(A), (a)(2)(B), and (a)(2)(G).

ORDER

NOW, THEREFORE, in consideration of the foregoing, it is **ORDERED** that:

1. Anthony R. Bookman's application for registration as a broker-dealer agent in the state of Tennessee is **DENIED**.

2. The applicant is advised that he has the right to a hearing on all matters raised in this Order of Denial. If the applicant wishes to exercise his right to a hearing, notice must be provided in writing to:

**Garron Amos
Associate General Counsel
Tennessee Department of Commerce and Insurance
Davy Crockett Tower
500 James Robertson Pkwy
Nashville, TN 37243**

3. The notice must be received within ten (10) calendar days of receipt of this Order. If the request is not timely received, this Order shall become effective as of 12:00 PM Central Time on the tenth day following service.

4. If a hearing is requested, and a notice of hearing and charges is pursued, the Division may request additional relief not requested in its petition, including but not limited to civil penalties and the costs of the hearing.

ENTERED AND EXECUTED December 18, 2020.


EB (Dec 17, 2020 13:59 CST)

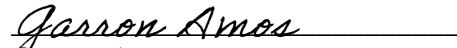
Elizabeth Bowling
Assistant Commissioner for Securities
Department of Commerce and Insurance

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the attached Petition for an Order of Denial and Order of Denial will be served upon Anthony R. Bookman via U.S. Certified Mail, Return Receipt Requested, and U.S. Mail to the below enclosed address on December 18, 2020.

Return Receipt No.: 7020 2450 0001 6623 0479

Anthony R. Bookman
820 N. Bishop Avenue
Dallas, TX 75208


Garron Amos



**BEFORE THE COMMISSIONER OF COMMERCE AND INSURANCE
FOR THE STATE OF TENNESSEE**

IN RE ANTHONY R. BOOKMAN

)
)
)

TSD No.: 20-065

PETITION FOR ORDER OF DENIAL

The Tennessee Securities Division of the Tennessee Department of Commerce and Insurance (“Division”), by and through undersigned counsel, pursuant to the Tennessee Securities Act of 1980, as amended, Tenn. Code Ann. §§ 48-1-101 through 48-1-201 *et seq.* (“Tennessee Securities Act”), petitions the Assistant Commissioner to issue an Order of Denial of Anthony R. Bookman’s application for registration as a broker-dealer agent, submitted by Seaport Global Securities, LLC.

I. JURISDICTION

1. The Commissioner of the Department of Commerce and Insurance (“Commissioner”) is responsible for the administration of the Tennessee Securities Act. The Division, pursuant to Tenn. Code Ann. § 48-1-115, is the lawful agent through which the Commissioner discharges this responsibility.

2. Tenn. Code Ann. § 48-1-115 and Tenn. Comp. R. & Regs. 0780-04-01-.04(1)(b)4. expressly empower the Assistant Commissioner to issue orders of effective registration, orders of denial, and other orders not involving any sanctions.

II. ALLEGED FACTS

3. Anthony R. Bookman (“Bookman”), CRD # 3185872, is a non-resident with an address on record with the Division of 820 N. Bishop Avenue, Dallas, TX 75208.

4. On September 16, 2020, Seaport Global Securities, LLC (“Seaport”) submitted an application on behalf of Bookman for registration with the Division to conduct business as a broker-dealer agent in Tennessee.

5. Perry Warden (“Warden”), Securities Examiner III with the Division, reviewed Bookman’s application and discovered that Bookman failed to disclose an administrative action against him in his application.

6. On or about September 3, 2008, the State of Colorado Securities Commissioner entered a Final Cease and Desist Order (“Order”) against Bookman, ordering Bookman to immediately cease and desist from offering or selling securities in or from Colorado, and from otherwise violating the Colorado Securities Act.

7. The Order concluded that Bookman offered and sold unregistered securities; acted as an unlicensed broker-dealer or sales representative; and offered and sold securities in a fraudulent manner, in violation of the Colorado Securities Act.

8. On September 22, 2020, Warden issued a letter to Seaport asking why Bookman did not disclose the Order.

9. Instead of responding to the letter, Bookman attempted to withdraw his application on November 23, 2020.

10. Bookman’s application for registration was deemed complete on November 24, 2020.

III. APPLICABLE LAW

11. The Tennessee Securities Act places the responsibility for its administration with the Commissioner. The Division is the lawful agent through which the Commissioner discharges this responsibility pursuant to Tenn. Code Ann. § 48-1-115.

12. Tenn. Code Ann. § 48-1-115 and Tenn. Comp. R. & Regs. 0780-04-01-.04(1)(b)4. expressly empower the Assistant Commissioner to issue orders of effective registration, orders of denial, and other orders not involving any sanctions.

13. Tenn. Code Ann. § 48-1-112(a)(1), (a)(2)(A), (a)(2)(B), and (a)(2)(G) provides that the Commissioner may by order deny registration upon finding that the order is in the public interest and necessary for the protection of investors; the applicant filed an application for registration which includes any untrue statement of a material fact or omits to state any material fact required to be stated therein or necessary to make the statements therein, in light of the circumstances under which they were made, not misleading; the applicant willfully violated or willfully failed to comply with any provision of the Act or any rule under the Act; or the applicant engaged in dishonest or unethical practices in the securities business.

14. Tenn. Comp. R. & Regs. 0780-04-03-.02(6)(a)19. states that failing to provide information requested by the Division pursuant to the Act or these Rules promulgated thereunder, shall be deemed dishonest or unethical business practices by an agent under Tenn. Code Ann. § 48-1-112(a)(2)(G).

IV. CAUSES OF ACTION

15. The Facts herein demonstrate that Bookman filed an application for registration which includes an untrue statement of a material fact or omits to state a material fact required to be stated therein or necessary to make the statements therein, in light of the circumstances under

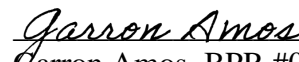
which they were made, not misleading when he failed to disclose an administrative action against him in violation of Tenn. Code Ann. § 48-1-112(a)(2)(A) and (a)(2)(B).

16. The Facts herein show that applicant Bookman committed dishonest and unethical practices in the securities business when he acted as an unregistered agent and sold unregistered and fraudulent securities in Colorado, then failed to disclose the Colorado administrative action against him to the Division, and failed to respond to the Division's letter asking him why he failed to disclose the administrative action, in violation of Tenn. Comp. R. & Regs. 0780-04-03-.02(6)(a)19. and Tenn. Code Ann. § 48-1-112(a)(2)(A) and (a)(2)(G).

V. PRAYER FOR RELIEF

Pursuant to the Tennessee Securities Act, the Division respectfully requests that the Assistant Commissioner issue an Order denying the application for registration of Anthony R. Bookman as a broker-dealer agent in Tennessee.

Respectfully Submitted,



Garron Amos, BPR #035924
Associate General Counsel
500 James Robertson Parkway
Nashville, TN 37243
(615) 360-4225
Garron.Amos@tn.gov



**BEFORE THE COMMISSIONER OF COMMERCE AND INSURANCE
FOR THE STATE OF TENNESSEE, AT NASHVILLE**

IN RE ANTHONY R. BOOKMAN

)
)
)

TSD No.: 20-066

AFFIDAVIT OF PERRY WARDEN

STATE OF TENNESSEE

)

)

COUNTY OF DAVIDSON

)

1. I declare under penalty of perjury that the foregoing is true and correct.
2. I am over eighteen (18) years of age, competent to provide testimony, and a citizen of Tennessee, with personal knowledge of the matters stated herein.
3. The statements contained herein are true, accurate, and correct to the best of my knowledge, information, and belief.
4. I am currently employed as a Securities Examiner III with the Securities Division ("Division") of the Tennessee Department of Commerce and Insurance.
5. As a Securities Examiner III, my duties include, but are not limited to, investigations into alleged actions or inactions that harm the public interest and investors, and that potentially violate applicable statutes, rules, and regulations pursuant to the Tennessee Securities Act of 1980 ("Act").
6. On September 16, 2020, I was assigned to examine an application submitted the same day by Seaport Global Securities, LLC ("Seaport") on behalf of Anthony R. Bookman

("Bookman"), CRD #3185872, for registration with the Division to conduct business as a broker-dealer agent in Tennessee.

7. Upon review of Bookman's application, I noticed that Bookman failed to disclose an administrative action against him in Colorado. (See Exhibit A).

8. On or about September 3, 2008, the State of Colorado Securities Commissioner entered a Final Cease and Desist Order ("Order") against Bookman, ordering Bookman to immediately cease and desist from offering or selling securities in or from Colorado, and from otherwise violating the Colorado Securities Act. (See Exhibit A).


9. The Order concluded that Bookman offered and sold unregistered securities; acted as an unlicensed broker-dealer or sales representative; and offered and sold securities in a fraudulent manner, in violation of the Colorado Securities Act.

10. On September 22, 2020, I sent a letter to Seaport asking why Bookman did not disclose the Order. (See Exhibit B).

11. Bookman failed to respond to the letter and attempted to withdraw his application on November 23, 2020.

12. I deemed Bookman's application complete on November 24, 2020.


FURTHER AFFIANT SAITH NOT



Perry Warden

Sworn to and subscribed on this 18 day of December, 2020.




Dec. 18, 2020