

**BEFORE THE ARKANSAS SECURITIES COMMISSIONER**

**CASE NO. S-18-0031**

**RECEIVED**  
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**ARKANSAS SECURITIES DEPT.**

**IN THE MATTER OF:  
YOUSUF SALJOOKI**

**RESPONDENT**

**COMPLAINT**

The Staff of the Arkansas Securities Department (“Staff”), by and through its attorney, Aislinn Andrews, for its Complaint states as follows:

**ADMINISTRATIVE AUTHORITY**

1. This Complaint is filed pursuant to the Arkansas Securities Act (“Act”), codified at Ark. Code Ann. §§ 23-42-101 through 23-42-509, the Rules of the Arkansas Securities Commissioner promulgated thereunder (“Rules”), and the Arkansas Administrative Procedures Act, codified at Ark. Code Ann. §§ 25-15-201 through 25-15-209, and is therefore properly before the Arkansas Securities Commissioner (“Commissioner”) pursuant to Ark. Code Ann. § 23-42-308.

**RESPONDENT**

2. Yousuf Saljooki (“Saljooki”), CRD # 5045123, is a New York resident who filed an application for registration with the Arkansas Securities Department (“Department”) as a broker-dealer agent with Worden Capital Management LLC (“Worden”), CRD # 148366.

**FACTUAL ALLEGATIONS**

3. Saljooki was employed by SW Financial from August 21, 2015 until December 15, 2017. Saljooki’s employment with SW Financial was terminated on December 15, 2017.

4. On December 21, 2017, Saljooki filed an application for registration with the Department as a broker-dealer agent with Worden.

5. On January 2, 2018 and January 22, 2018, the Staff sent a letter to Worden requesting additional information regarding Saljooki and his registration application. On January 17, 2018 the Staff contacted SW Financial requesting additional information regarding Saljooki's termination. The Staff has not received a response to the January 22, 2018 request to Worden.

6. A review of the registration application by the Staff revealed an undisclosed outstanding federal tax lien in the amount of \$227,859.29 filed by the Internal Revenue Service against Saljooki on February 24, 2016 in Suffolk County, New York.

### **VIOLATIONS OF THE ACT**

7. Ark. Code Ann. § 23-42-308 provides, in part, that the Commissioner may deny a registration if he finds that the applicant filed an application for registration that was incomplete in any material respect. Saljooki's application for registration with the Department failed to disclose the \$227,859.29 federal tax lien filed against him. Thus, Saljooki violated Ark. Code Ann. § 23-42-308.

### **REQUESTED RELIEF**

WHEREFORE, the Staff respectfully prays that its Complaint be received, that a date for a hearing on the merits be set, and that upon a final hearing the Commissioner by order deny Saljooki's application for registration in accordance with Ark. Code Ann. § 23-42-308.

Respectfully submitted this 9th day of March, 2018.



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