

BEFORE THE DIVISION OF INSURANCE  
DEPARTMENT OF LABOR AND REGULATION  
STATE OF SOUTH DAKOTA

IN THE MATTER OF  
KATHERINE ZAMORA

)  
)  
)

ORDER DENYING  
REGISTRATION APPLICATION

TO: B.B. Graham & Company, Inc.  
C/O Brad Callen  
4800 Bee Caves Rd.  
Austin, TX 78746

Larry Deiter, the Director of the South Dakota Division of Insurance, ("Director") has determined the following:

- 1) KATHERINE ZAMORA, whose last known address is 430 Ridgewood Drive, Austin, TX 78746, is an applicant for a securities registration in the State of South Dakota;
- 2) KATHERINE ZAMORA applied for registration in South Dakota on October 30, 2018 and her application has been pending since that time;
- 3) Pursuant to SDCL § 47-31B-602(a)(1), the Director may conduct public or private investigations within or outside of this state which the Director considers necessary or appropriate to determine whether a person has violated, is violating, or is about to violate chapter 47-31B, or to aid in the enforcement of the chapter or in the adoption of rules and forms under this chapter;
- 4) On October 31, 2018 the Division of Insurance sent a letter to KATHERINE ZAMORA asking her to provide a copy of her current disclosure history and to provide an explanation for all events reported on the disclosure history;
- 5) On December 5, 2018, the Division of Insurance wrote to KATHERINE ZAMORA's employer, asking for KATHERINE ZAMORA to either provide the requested information and records, or withdraw the application for registration;
- 6) The Division of Insurance attempted to call KATHERINE ZAMORA and her employer on December 5, 2018, January 2, 2019, and January 8, 2019, to attempt to have the documentation and records provided or to have the application for registration withdrawn;
- 7) KATHERINE ZAMORA informed the Division of Insurance on January 10, 2019 that she would provide a response to the October 31, 2018 letter by no later than January 15, 2019;
- 8) KATHERINE ZAMORA provided some of the requested information on February 12, 2019;
- 9) Additional explanations have been requested on several additional occasions which have not been supplied by KATHERINE ZAMORA;

10) KATHERINE ZAMORA violated SDCL § 47-31B-406(a)(2) by not providing information or records as requested by the Director;

11) KATHERINE ZAMORA violated the following subdivisions of SDCL § 47-31B-412:

(d)(1) ... filed an application for registration in this state under this chapter [that] . . . was incomplete in any material respect or contained a statement that, in light of the circumstances under which it was made, was false or misleading with respect to a material fact;

(d)(5)(A) Is the subject of an order of [any financial regulator] . . . denying, revoking, barring, or suspending registration as a broker-dealer, agent, investment adviser, federal covered investment adviser, or investment adviser representative;

(d)(8) Refused to allow or otherwise impeded the Director from conducting an audit or inspection . . .

12) Pursuant to SDCL § 47-31B-412(a), the Director may deny the registration of any applicant if the agent has willfully failed to comply with any provision of SDCL Chapter 47-31B or any rule or order under SDCL Chapter 47-31B;

13) The Director has reasonable grounds pursuant to SDCL § 47-31B-412(a) to deny the registration of KATHERINE ZAMORA for her willful failure to comply with the Division's request to provide information to the Division or withdraw her application for registration;

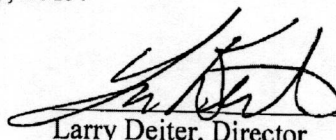
14) The following orders are necessary and appropriate in the public interest and for the protection of investors and are consistent with the policies and provisions of the South Dakota Uniform Securities Act, SDCL Chapter 47-31B;

15) That pursuant to SDCL § 47-31B-604(d), the Division may impose a civil penalty of up to \$10,000 for each violation of SDCL Chapter 47-31B;

Now therefore, good cause appearing from the foregoing, IT IS HEREBY ORDERED, pursuant to SDCL §§ 47-31B-412(a) and 47-31B-412(f) that KATHERINE ZAMORA's application for registration in South Dakota is hereby denied.

KATHERINE ZAMORA is hereby notified that she is entitled to a hearing pursuant to SDCL § 47-31B-412(f). If a hearing is not requested by KATHERINE ZAMORA within thirty days this Order becomes final by operation of law. Any hearing in this matter shall be conducted according to procedures for contested cases as prescribed in SDCL Chapter 1-26.

Dated at Pierre, South Dakota this 16<sup>th</sup> day of May, 2019.



Larry Deiter, Director  
South Dakota Division of Insurance

BEFORE THE DIVISION OF INSURANCE  
DEPARTMENT OF LABOR AND REGULATION  
STATE OF SOUTH DAKOTA

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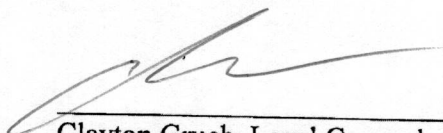
IN THE MATTER OF  
KATHERINE ZAMORA

) NOTICE OF ENTRY OF  
) ORDER DENYING  
) REGISTRATION APPLICATION

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NOTICE IS HEREBY GIVEN, that attached hereto, is a true and correct copy of the Order Denying Registration Application entered by Larry Deiter, Director of the South Dakota Division of Insurance, on May 16, 2019. The same will be effective thirty days from the date of this Notice of Entry of Order unless a hearing is requested.

Dated this 16th day of May, 2019.

  
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Clayton Grueb, Legal Counsel  
South Dakota Division of Insurance  
2330 N. Maple Ave. Suite 1  
Rapid City, SD 57701  
(605) 394-3396

## CERTIFICATE OF SERVICE

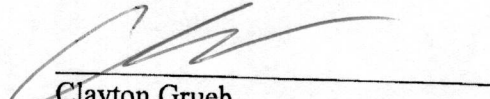
I, Clayton Grueb, the undersigned, do hereby certify that on the date shown below, a true and correct copy of the Order Denying Registration Application with respect to the above-entitled action was sent U.S. Certified Mail thereon, to the following:

Katherine Zamora  
430 Ridgewood Rd  
Austin, TX 78746

Katherine Zamora  
4800 Bee Cave Dr.  
Austin, TX 78746

Katherine Zamora  
4900 Spicewood Springs Rd.  
Suite 300  
Austin, TX 78759

Dated this 16th day of May, 2019 in Rapid City, South Dakota.



Clayton Grueb  
Legal Counsel  
South Dakota Division of Insurance  
2330 N. Maple Ave. Suite 1  
Rapid City, SD 57701  
(605) 394-3396