

**STATE OF MICHIGAN  
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
CORPORATIONS, SECURITIES & COMMERCIAL LICENSING BUREAU**

In the matter of:

Agency No. 335538

CLIFFORD W. SHIRAH  
CRD# 2767896

Applicant.  
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Issued and entered  
This 16<sup>th</sup> day of April, 2018

**NOTICE OF INTENT TO DENY SECURITIES AGENT AND  
INVESTMENT ADVISER REPRESENTATIVE REGISTRATION APPLICATIONS**

**I. RELEVANT FACTS AND APPLICABLE LAW.**

Relevant information and statutory provisions, under the Michigan Uniform Securities Act (2002) (“the Securities Act”), 2008 PA 551, as amended, MCL 451.2101 *et seq.*

1. Clifford W. Shirah (“Applicant”) has previously been registered as a securities agent through multiple broker-dealers under the Securities Act in Michigan. Applicant was most recently registered as a securities agent through ProEquities, Inc. (CRD#15708), until his registration was terminated on or around January 4, 2018 for signing and initialing customer documents without the customers’ prior knowledge or consent.
2. Applicant applied for registration as a securities agent through IFS Securities (CRD# 40375), a Michigan-registered broker-dealer on or around January 17, 2018; the application became complete on or around March 2, 2018.
3. A review of information related to Applicant’s securities agent registration application by staff at the Corporations, Securities, and Commercial Licensing Bureau (“the Bureau”) within the State of Michigan Department of Licensing and Regulatory Affairs revealed that Respondent, while employed by ProEquisites, Inc., forged customer signatures and initials on account documents. ProEquities, Inc. allowed Applicant to resign as a result of various signature irregularities, and his registration through ProEquities, Inc. was terminated.
4. The Director of the Bureau (“Administrator”) has reviewed materials relating to the January 17, 2018 application referred to in paragraph two, above. The Administrator finds that Applicant’s conduct in the securities industry within the previous ten years, discussed in paragraph 3, was dishonest or unethical. Based on Applicant’s past conduct discussed above and hereafter, the Administrator has determined that the denial of

Applicant's securities agent application is authorized, appropriate, and in the public interest.

5. Section 412(1) of the Securities Act, MCL 451.2412(1), provides that if the Administrator finds that the Order is in the public interest and MCL 451.2412(4) authorizes the action, the Administrator may issue an Order denying, conditioning, or limiting an application for registration as a securities agent and as an investment adviser representative.

6. Section 412(4) of the Securities Act, MCL 451.2412(4) states in relevant part:

(4) A person may be disciplined under subsections (1) to (3) if any of the following apply to the person:

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(m) The person has engaged in dishonest or unethical practices in the securities, commodities, investment, franchise, banking, finance, or insurance business within the previous 10 years...

7. Section 412(6) of the Securities Act, MCL 451.2412(6), authorizes the Administrator to deny a registration application pending final determination of an administrative proceeding.

8. The Administrator may deny Applicant's securities agent registration application under sections 412(1) and 412(4)(m) of the Securities Act, MCL 451.2412(1) and MCL 451.2412(4)(m), because Applicant engaged in dishonest or unethical business practices in the securities industry within the previous ten years when he forged customer signatures and initials on documents.

## II. ORDER.

The Administrator finds that this ORDER is authorized, appropriate, and in the public interest based on the above-cited facts and law.

IT IS ORDERED as follows:

1. The Administrator intends to deny the securities agent registration application of Clifford W. Shirah, under section 412(1) of the Securities Act, MCL 451.2412(1), because Applicant engaged in dishonest or unethical behavior in the securities industry within the previous ten years, which supports the denial of his registration application under the above-cited provisions of the Michigan Uniform Securities Act (2002), 2008 PA 551, MCL 451.2101 *et seq.*

2. In accordance with sections 412(1) and (6) of the Securities Act, MCL 451.2412(1) and (6): This is NOTICE that the Administrator intends to deny Applicant's securities agent registration application, and that Applicant has thirty (30) calendar days after the date that this Order is

served on Applicant to submit a written request to the Administrator that this matter be scheduled for a hearing. If the Administrator timely receives a written request, the Administrator shall schedule a hearing within 15 days after receipt of the written request. If a hearing is not requested by Applicant or is not ordered by the Administrator within 30 days after the date of service of this Order, Applicant's application for securities agent registration will be DENIED. If a hearing is requested or ordered, the Administrator, after notice of and an opportunity for hearing to Applicant, may modify or vacate this Order or extend the Order until final determination.

3. Applicant is responsible for notifying his relevant supervisor and/or the Chief Compliance Officer of his employing firm of the issuance of this Order according to firm policies or procedures. A copy of this Order will not be mailed to Applicant's supervisor or the firm's Chief Compliance Officer. Agency representatives will only discuss this Order with a representative of Applicant's employing firm when Applicant or an attorney on Applicant's behalf is also present, because the firm is not a party to this administrative proceeding.

**If Applicant requests a hearing, the request must be in writing and filed with the Department of Licensing and Regulatory Affairs, Corporations, Securities & Commercial Licensing Bureau, Regulatory Compliance Division, P.O. Box 30018, Lansing, MI 48909.**

DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS  
CORPORATIONS, SECURITIES, AND COMMERCIAL LICENSING BUREAU

By:



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Julia Dale, Administrator and Director  
Corporations, Securities & Commercial Licensing Bureau