

BEFORE THE  
DIVISION OF SECURITIES  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
STATE OF WISCONSIN

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In the Matter of  
STEPHEN M. SIRIANNI

PETITION FOR ORDER

Respondent.

File No. S-05209-L

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The staff of the Bureau of Licensing & Compliance of the Division of Securities, Department of Financial Institutions, State of Wisconsin has conducted an investigation in this matter pursuant to sec. 551.56, Wis. Stats. and as a result thereof allege as follows:

1. Stephen M. Sirianni ("Sirianni") was an agent (CRD #715867) with a last known address of 2938 North Murray Avenue, Milwaukee, WI 53211;

2. At all times material hereto, Sirianni was licensed as a securities agent with Berthel, Fisher & Company Financial Services, Inc. ("Berthel");

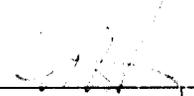
3. During at least March 31, 2003 through October 8, 2004, Sirianni effected securities transactions for at least one customer's account in Wisconsin which were not recorded on the regular books or records of his broker-dealer, Berthel, and were not disclosed to and authorized in writing by Berthel prior to the execution of the transactions;

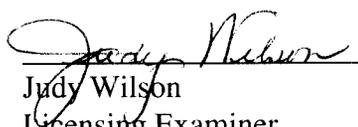
4. Sirianni's actions, as described in Paragraph 3 above, are deemed a violation of NASD Rule 3040 with regard to Private Securities Transactions and are deemed by section DFI-Sec 4.06(2)(i), Wis. Adm. Code to be a dishonest or unethical business practice or taking unfair advantage of a customer and provide a basis, pursuant to sec. 551.34(1)(g), Wis. Stats., for the suspension of an agent's license;

5. Sirianni's actions, as described in Paragraph 3 above, are deemed by DFI-Sec 4.06(2)(c), Wis. Adm. Code to be a dishonest or unethical business practice or taking unfair advantage of a customer and provide a basis, pursuant to sec. 551.34(1)(g), Wis. Stats., for the suspension of an agent's license;

THEREFORE, the staff of the Bureau of Licensing & Compliance of the Division of Securities petitions the Administrator for the issuance of the attached Order.

DATED this 5<sup>th</sup> day of March, 2006.

  
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Kenneth L. Hojnacki  
Director  
Bureau of Licensing & Compliance

  
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Judy Wilson  
Licensing Examiner  
Bureau of Licensing & Compliance