

STATE OF NEBRASKA
Department of Banking & Finance

IN THE MATTER OF:	)	
	)	
Daniel Roper	)	FINDINGS OF FACT
330 Beverly Drive	)	CONCLUSIONS OF LAW
Omaha, Nebraska	)	AND
	)	CONSENT ORDER
CRD No. 6188279	)	
	)	

THIS MATTER comes before the Nebraska Department of Banking and Finance (“Department”), by and through its Director, pursuant to its authority under the Securities Act of Nebraska, Neb. Rev. Stat. §§ 8-1101 to 8-1123 (Reissue 2022; Cum. Supp. 2024; Supp. 2025; LB 717, 2026) (“Act”). Pursuant to Neb. Rev. Stat. § 8-1115 (Reissue 2022), the Department has investigated the acts of Daniel Roper, 330 Beverly Drive, Omaha, Nebraska, CRD No. 6188279 (“Roper”). As a result of such investigation, and being fully advised and informed in the matter, the Director and Roper enter into the following Findings of Fact, Conclusions of Law, and Consent Order (“Order”).

FINDINGS OF FACT

1. Roper was registered as an agent of multiple broker-dealers in Nebraska from August 5, 2013, to September 15, 2023. Roper was most recently registered as an agent of Charles Schwab & Co., Inc. (“Schwab”) from March 22, 2019, to September 15, 2023.
2. References to clients of Schwab and Roper shall be by way of initials in order to protect the privacy of such individuals. Roper is aware of the identity of such individuals. The Department will provide Roper with a list of such individuals upon request.

3. In July 2023, Schwab discovered that Roper was using JH's login credentials to log into JH's account to place trades. JH is Roper's mother. Schwab determined that this conduct violated Schwab's policies and determined it would terminate Roper's employment; however, Roper resigned before Schwab had the opportunity to complete the termination.

4. CW was a client of Schwab and of Roper. Beginning in October 2022, Roper utilized CW's login credentials to access CW's Schwab account. From October 2020 to January 2022, Roper entered more than 14,000 equity trades and 6,300 option trades in CW's retail account, in exchange for a share of the profits from such activity. Roper received \$80,747.00 in profit sharing payments from CW.

5. Roper actively concealed this arrangement from Schwab through multiple methods, including using his personal device and personal email address to communicate with CW, receiving payments from CW from CW's non-Schwab account, and depositing those payments into Roper's non-Schwab checking account.

6. On July 17, 2025, Roper was the subject of an Acceptance, Waiver, and Consent ("AWC") by the Financial Industry Regulatory Authority ("FINRA"). FINRA found that Roper's conduct violated FINRA Rule 2150(c), FINRA Rule 2010, FINRA Rule 3260(b) and FINRA Rule 4511. The AWC imposed a two-year suspension from associating with any FINRA member firm, a \$15,000.00 fine, and disgorgement of \$80,747.00.

7. During the Department's investigation, the Department also identified an account at E*Trade Securities LLC ("E*Trade") owned by Roper's wife that appeared to have similar trading activity to the activity in CW's account. Roper's wife's E*Trade account was opened on June 23, 2020, while Roper was employed by Schwab. The E*Trade account remained open throughout the rest of Roper's employment with Schwab.

8. Schwab requires its employees to disclose outside brokerage accounts, including accounts held by its employees, spouses, and minor children, and requires employees to obtain permission before opening such accounts. Roper never notified Schwab of the opening of this account.

9. On January 26, 2021, Roper completed his required annual compliance attestation. Question #2 specifically asked whether Roper or his spouse maintained a securities account with a financial institution other than Schwab. Roper answered “No.” Therefore, Roper provided a false 2021 compliance attestation to Schwab.

10. On August 3, 2022, Roper completed his required annual compliance attestation. Roper was required to attest to the accuracy of a list of securities accounts that Roper had disclosed to Schwab. This list included accounts owned by Roper and by Roper’s wife. All the accounts on the list were held at Schwab; the E*TRADE account was not disclosed. Therefore, Roper provided a false 2022 compliance attestation to Schwab.

CONCLUSIONS OF LAW

1. The Department has jurisdiction in this matter under the Act.
2. Neb. Rev. Stat. § 8-1103(1) (Reissue 2023) provides in part that it shall be unlawful for any person to transact business as a broker-dealer or agent in Nebraska unless registered with the Department.
3. FINRA Rule 2150(c) states, in relevant part, that "no member or person associated with a member shall share directly or indirectly in the profits ... in any account of a customer carried by the member or any other member" unless the associated person (a) obtains prior written authorization from the employer firm, (b) obtains prior written authorization from the customer, and (c) shares in the profits in direct proportion to his financial contributions.

4. FINRA Rule 3260(b) provides that no registered representative "shall exercise any discretionary power in a customer's account" unless the customer has given prior written authorization to the registered representative and the representative's member firm has accepted the account as discretionary, as evidenced in writing by the member. FINRA Rule 4511(a) requires each member to "make and preserve books and records as required under the FINRA rules, the Exchange Act, and the applicable Exchange Act rules." Section 17(a) of the Securities Exchange Act of 1934 and Exchange Act Rule 17a-4(b)(4) requires member firms to maintain, for a period of not less than three years, the originals of all communications received, and copies of all communications sent, by the member relating to the member's business, including text messages and other electronic messages. A registered representative who causes his or her member firm to fail to comply with its recordkeeping obligations violates FINRA Rule 4511.

5. FINRA Rule 3210 provides that no person associated with a member ("employer member") shall, without the prior written consent of the member, open or otherwise establish at a member other than the employer member ("executing member"), or at any other financial institution, any account in which securities transactions can be effected and in which the associated person has a beneficial interest. Any associated person, prior to opening or otherwise establishing an account subject to this Rule, shall notify in writing the executing member, or other financial institution, of his or her association with the employer member.

6. FINRA Rule 2010 requires associated persons to observe high standards of commercial honor and just and equitable principles of trade in the conduct of their business.

7. 48 NAC 12.003.06 provides that it is a violation of the Act for an agent to fail to comply with any applicable provision of fair practice or ethical rules and/or standards promulgated by the SEC, FINRA, or by a self-regulatory organization approved by the SEC.

8. 48 NAC 12.005.04 provides that it is a violation of the Act for an agent to share directly or indirectly in profits or losses in the account of any customer unless the agent obtains the written authorization of the customer and the broker-dealer which the agent represents and the agent's share of profits or losses is in direct proportion to the financial contributions made to such account by either the member or person associated with a broker-dealer.

9. Neb. Rev. Stat. 8-1103(9)(a)(ii) (Reissue 2022) provides that the Director may by order deny, suspend, or revoke registration of any investment adviser or investment adviser representative or bar, censure or impose a fine pursuant to subsection (4) of Section 1108.01 if the Director finds that the order is in the public interest and that the registrant has willfully violated or willfully failed to comply with any provision of the Securities Act of Nebraska or any rule and regulation or order under the Act;

10. The facts contained in the above Findings of Facts constitute willful violations of FINRA rules of conduct and of the Act.

11. Neb. Rev. Stat. 8-1103(9)(a)(viii) (Reissue 2022) provides that the Director may by order deny, suspend, or revoke registration of any investment adviser or investment adviser representative or to bar, censure or impose a fine pursuant to subsection (4) of Section 1108.01 if the Director finds that the order is in the public interest and that the registrant has engaged in dishonest or unethical practices in the securities or commodities business.

12. The facts contained in the above Findings of Fact constitute dishonest and unethical practices in the securities industry by Roper.

13. Neb. Rev. Stat. § 8-1108.01(4) (Reissue 2022) provides that the Director may, after giving reasonable notice and an opportunity for a hearing, impose a fine not to exceed twenty-five thousand dollars per violation, in addition to costs of the investigation, upon a person found to

have engaged in any act or practice which would constitute a violation of the Act or any rule, regulation, or order issued under the Act.

14. Under the Act's statutory framework, the Director has legal and equitable authority to fashion significant protective remedies.

15. It is in the best interest of Roper, and it is in the public's best interest, for Roper and the Director to mutually resolve the issues included herein.

STIPULATIONS

In connection with this Consent Order, Roper and the Director stipulate to the following:

1. The Department has jurisdiction as to all matters herein.
2. This Consent Order shall resolve all matters between the Department and Roper in connection with the Findings of Fact listed above. Should future circumstances warrant, the facts from this matter may be considered in a future administrative action by the Department.

Roper further represents as follows:

1. Roper is aware of its right to a hearing on these matters at which it may be represented by counsel, present evidence, and cross-examine witnesses. The right to such a hearing, and any related appeal, is irrevocably waived.
2. Roper is acting free from any duress or coercion of any kind or nature.
3. This Consent Order is executed to avoid further proceedings and constitutes an admission of violations of the Act solely for the purpose of this Consent Order and for no other purpose.

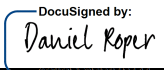
CONSENT ORDER

IT IS THEREFORE ORDERED as follows:

1. Subject to Paragraph 2 of this Order below, Daniel Roper is permanently barred from the securities industry in Nebraska and shall not apply now, or at any time in the future, for registration as a broker-dealer, broker-dealer agent, investment adviser, or investment adviser representative under the Act.
2. Daniel Roper may submit a request to the Director to lift the bar after five years from the effective date of this Order. The decision as to whether to lift the bar, and under what conditions, shall be at the discretion of the Director, but will not be unreasonably withheld and Roper will have a full opportunity to be heard, consistent with Department rules and regulations, upon any application to lift the bar.
3. The Order to Show Cause issued March 3, 2026, is hereby vacated and the hearing scheduled for July 16, 2026, is hereby canceled.
4. The effective date of this Order shall be the date of the Director's signature.

DATED this 8th day of June, 2026.

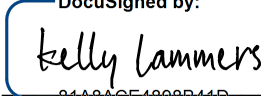
DANIEL ROPER

By: 
Daniel Roper

330 Beverly Drive
Omaha, Nebraska 68136

DATED this 8th day of June, 2026.

**STATE OF NEBRASKA
DEPARTMENT OF BANKING AND FINANCE**

DocuSigned by:

By: 81A8ACE4898B41D...
Kelly Lammers, Director

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