

**STATE OF VERMONT
DEPARTMENT OF FINANCIAL REGULATION
SECURITIES DIVISION**

IN THE MATTER OF:)	
)	
)	
DARRAUGH VALLI, Agent (CRD # 2191309))	
and)	
CAMBRIDGE INVESTMENT RESEARCH,)	DOCKET NO. 24-02-S
INC., Broker (CRD# 39543); and)	
FAMILY INVESTORS, Broker (CRD# 1785))	
)	
)	
)	

**ORDER AUTHORIZING DUAL REGISTRATION
UNDER THE VERMONT UNIFORM SECURITIES ACT**

WHEREAS, Cambridge Investment Research, Inc., Broker (CRD# 39543) (“Cambridge”) and Family Investors, Broker (CRD# 1785) (“Family Investors”), registered broker- dealers pursuant to the Securities Act, have requested approval for the dual registration of Darraugh Valli, Agent (CRD #2191309) (“Valli”), as an agent to be employed by or associated with Cambridge and Family Investors in Vermont pursuant to 9 V.S.A. Chapter 150, as amended (the "Securities Act"); and

WHEREAS, under the Securities Act, the Commissioner of the State of Vermont Department of Financial Regulation (the "Commissioner") has general supervision and control over any and all broker-dealer firms and their agents, residing or doing business in Vermont; and

WHEREAS, 9 V.S.A. § 5402(e) establishes a requirement that an individual seeking to act

as an agent for more than one unaffiliated broker-dealer must receive prior approval from the Commissioner by Order; and

WHEREAS, the Commissioner, through his designated representative, the Securities Division (the "Division"), has reviewed the request from Cambridge and Family Investors for approval of Valli's dual registration as an agent for Cambridge and Family Investors and has determined that this request for dual registration as a broker-dealer agent shall be approved, subject to certain terms, conditions, and undertakings agreed upon by Valli, Cambridge and Family Investors; and

NOW THEREFORE, IT IS ORDERED that:

1. Cambridge and Family Investors's request for approval of Valli's dual registration as an agent employed by or associated with Cambridge and Family Investors is hereby approved, subject to the continuous compliance of Valli, Cambridge and Family Investors with the following undertakings and conditions while this Order is in effect:

- a. Each firm consents to the registration of the listed individual by the other firm.
- b. Each firm assumes joint and several liability with the other firm for any act or omission of Valli in violation of the State's securities laws or any Rule or order promulgated pursuant to the State's securities laws during the period of registration.
- c. Each firm has established appropriate procedures designed to prevent or correct any conflict of interest arising out of the dual representation and to guard against violations of the State's securities laws and the Securities Exchange Act of 1934.

- d. Each firm agrees that:
 - (i) The firm shall be primarily responsible for supervising Valli and assumes all duties and responsibilities imposed by the State's laws and regulations for the securities transactions of Valli to the same extent as if such registrant were only registered with such firm, and
 - (ii) Nothing in this Order or the Rules shall relieve the firm for which the registrant is actually acting, of the responsibilities imposed by the State's laws and regulations for the securities transactions of such registrant.
- e. Each firm agrees to register the individual with the State and pay the appropriate registration fees.
- f. Each firm acknowledges this undertaking as an addendum to all prior undertakings filed with the State.
- g. Each of Valli, Cambridge and Family Investors shall notify the Division in writing if Valli becomes the subject of an inquiry or investigation of any securities regulatory agency or self-regulatory organization, an arbitration proceeding, or securities-related litigation within fifteen (15) business days of receiving notice of such inquiry or investigation.
- h. Each of Valli, Cambridge and Family Investors shall furnish to the Division a copy of any written complaint or action, or a written summary of any oral complaint, which is made with respect to Valli within fifteen (15) business days of receiving such complaint or action, when such complaint or action concerns a Vermont resident, or any sale, offer to sell, purchase or offer to purchase of any

security(ies) or other activity that is subject to the jurisdiction of the Securities Act.

i. Valli, Cambridge and Family Investors shall comply with and abide by all procedures designed to prevent or correct any conflict of interest arising out of the dual licensing relationships and to guard against violations of the State's securities laws and the Securities Exchange Act of 1934. As long as this Order remains in effect, Valli shall not transfer registration from Cambridge and Family Investors to another broker-dealer pursuant to any mass transfer, without prior approval of the Division. Such approval shall not be presumed from completion of the mass transfer.

j. Each of Valli, Cambridge and Family Investors shall notify the Division in writing if Valli terminates employment with Cambridge and Family Investors within fifteen (15) business days of the termination of employment.

2. Each of Valli, Cambridge and Family Investors acknowledges that any inaccuracy, omission, or untrue statement in any of the statements, undertakings or representations, whether verbal or written, covered by this Order, or otherwise made in connection with this Order, or any failure to comply with any provision of this Order may constitute grounds for enforcement action by the Division.

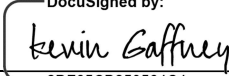
3. This Order shall become effective immediately upon the date set forth below and shall remain in effect until this Order is modified or rescinded by order of the Commissioner.

4. The dual registration of Valli as an agent employed by or associated with Cambridge and Family Investors shall become effective immediately upon the date set forth below. This Order shall apply to Valli's dual registration as an agent employed by or associated

with Cambridge and Family Investors and to all subsequent renewals of such registration until this Order is modified or rescinded by order of the Commissioner.

BY ORDER OF THE COMMISSIONER

Entered at Montpelier, Vermont, this 22nd day of January, 2024.

DocuSigned by:


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Kevin J. Gaffney, Commissioner
Vermont Department of Financial Regulation



January 4, 2024

Department of Financial Regulation
89 Main St., 3rd Floor
Montpelier, VT 05620

Attn: Amanda Smith

Re: Darraugh Valli CRD# 2191309
Peter Chemidlin CRD# 2591857

Dear Amanda,

Please be advised that we are aware of the dual registration of the above-named individual in Vermont as a registered representative of both Family Investors, CRD #1785, and Cambridge Investment Research, Inc., CRD #39543, effective January 4, 2024. Neither of the firms have a conflict with this dual registration and we hereby agree to assume joint and several liability for any act or omission of said representative during their employment period with said firms.

Dual registration is required to provide ample time for said representative to transfer clients to Cambridge Investment Research, Inc. Dual registration will be for 60 to 90 days at which time Family Investors Broker Dealer will close. Said representative does not have any disclosure issues.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Youhn".

Steve Youhn
Chief Compliance Officer
Cambridge Investment Research, Inc.
CRD #39543

A handwritten signature in black ink, appearing to read "Peter Chemidlin".

Peter Chemidlin
President
Family Investors
CRD #1785

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