

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

**IN THE MATTER OF:**

**THOMAS MERINGOLO, Agent (CRD #  
4192542)**

**and**

**LONG BRIDGE SECURITIES, LLC, Broker  
(CRD# 314519);**

**TULIPSHARE SECURITIES, LLC, Broker  
(CRD# 317568); and**

**DAM CAPITAL (USA) Inc., Broker (CRD#  
154945)**

**DOCKET NO. 23-22-S**

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

WHEREAS, Long Bridge Securities, LLC, Broker (CRD# 314519) (“Long Bridge”); Tulipshare Securities, LLC, Broker (CRD# 317568) (“Tulipshare”); and DAM Capital (USA) Inc., Broker (CRD# 154945) (“DAM Capital”), registered broker- dealers pursuant to the Securities Act, have requested approval for the multiple registration of Thomas Meringolo (“Meringolo”), (CRD #4192542) as an agent to be employed by or associated with Long Bridge, Tulipshare and DAM Capital 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 Long Bridge, Tulipshare and DAM Capital for approval of Meringolo's multiple registration as an agent for Long Bridge, Tulipshare and DAM Capital and has determined that this request for multiple registration as a broker-dealer agent shall be approved, subject to certain terms, conditions, and undertakings agreed upon by Long Bridge, Tulipshare and DAM Capital; and

NOW THEREFORE, IT IS ORDERED that:

1. Long Bridge, Tulipshare and DAM Capital's request for approval of Meringolo's multiple registration as an agent employed by or associated with Long Bridge, Tulipshare and DAM Capital is hereby approved, subject to the continuous compliance of Meringolo, Long Bridge, Tulipshare and DAM Capital 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 firms for any act or omission of Meringolo 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 multiple 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 Meringolo and assumes all duties and responsibilities imposed by the State's laws and regulations for the securities transactions of Meringolo 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 Meringolo, Long Bridge, Tulipshare and DAM Capital shall notify the Division in writing if Meringolo 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 Meringolo, Long Bridge, Tulipshare and DAM Capital 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 Meringolo 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. Meringolo, Long Bridge, Tulipshare and DAM Capital shall comply with and abide by all procedures designed to prevent or correct any conflict of interest arising out of the multiple 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, Meringolo shall not transfer registration from Long Bridge, Tulipshare and DAM Capital 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 Meringolo, Long Bridge, Tulipshare and DAM Capital shall notify the Division in writing if Meringolo terminates employment with Long Bridge, Tulipshare or DAM Capital within fifteen (15) business days of the termination of employment.

2. Each of Meringolo, Long Bridge, Tulipshare and DAM Capital 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 multiple registration of Meringolo as an agent employed by or associated with Long Bridge, Tulipshare and DAM Capital shall become effective immediately upon the date set forth below. This Order shall apply to Meringolo's multiple registration as an agent employed by or associated with Long Bridge, Tulipshare and DAM Capital 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 8 day of December, 2023.

  
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Kevin J. Gaffney, Commissioner  
Vermont Department of Financial Regulation