

STATE OF NEW JERSEY
BUREAU OF SECURITIES
P.O. Box 47029
Newark, New Jersey 07101
(973) 504-3600

IN THE MATTER OF: :

David Sanducci, :

CRD # 2370405 : REVOCATION ORDER

: :

David Sanducci
1232 78th Street
Brooklyn, NY 11228

Clayton, Dunnings & Company Inc.
45 Broadway, Suite 3030
New York, NY 10006.

Pursuant to the authority granted to the Chief of the New Jersey Bureau of Securities (“Bureau”) by the Uniform Securities Law, as amended, L. 1997, c. 276, N.J.S.A. 49:3-47 et seq., (“Law”), more particularly, N.J.S.A. 49:3-58, and after careful review and due consideration of the Offer of Settlement, CMS No. 040165, accepted by the NASD on March 21, 2006, the Bureau Chief has determined that the agent registration of David Sanducci shall be **REVOKED** for the reasons that follow:

1. David Sanducci, residing at 1232 78th Street, Brooklyn, NY 11228 has been registered with the Bureau as an agent of twelve different firms between 1994 and 2005. Sanducci first registered with the Bureau in March, 1994 as an agent of Citigroup Global Markets, Inc.
2. From March 7, 1994 through June 3, 1994, Sanducci was registered in New

Jersey as an agent of Citigroup Global Markets, Inc. (CRD # 7059).

3. From July 15, 1994, through July 31, 1995, Sanducci was registered in New Jersey as an agent of Nichols, Safina, Lerner, & Co. Inc. (CRD # 35476).

4. From July 31, 1995, through November 13, 1995, Sanducci was registered in New Jersey as an agent of Prime Charter Ltd. (CRD # 25668).

5. From November 3, 1995, through March 12, 1996, Sanducci was registered in New Jersey as an agent of Northeast Securities, Inc. (CRD # 25996).

6. From March 26, 1996 through August 22, 1997, Sanducci was registered in New Jersey as an agent of Mason Hill & Co., Inc. (CRD # 38308).

7. From August 8, 1997 through October 21, 1997, Sanducci was registered in New Jersey as an agent of R.D. White & Co., Inc. (CRD # 7011).

8. From October 17, 1997, through November 10, 1997, Sanducci was registered in New Jersey as an agent of Bluestone Capital Partners, LP. (CRD # 36189).

9. From December 10, 1997, through July 14, 1998, Sanducci was registered in New Jersey as an agent of The Boston Group. (CRD # 37652).

10. From June 23, 1998, through March 30, 1999, Sanducci was registered in New Jersey as an agent of Bluestone Capital Partners, LP. (CRD # 36189).

11. From March 4, 1999, through November 22, 1999, Sanducci was registered in New Jersey as an agent of Geneva Capital Corp. (CRD # 43747).

12. From January 10, 2000, through December 31, 2000, Sanducci was registered in New Jersey as an agent of The Concord Equity Group, LLC. (CRD # 14569).

13. From January 16, 2001, through December 31, 2002, Sanducci was registered in New Jersey as an agent of Park Capital Securities, LLC. (CRD # 104206).

14. From January 7, 2003, through December 31, 2003, Sanducci was registered in New Jersey as an agent of Park Capital Securities, LLC. (CRD # 104206).

15. Since November 10, 2003, Sanducci has been registered in New Jersey as an agent of Clayton, Dunnings, & Company, Inc. (CRD # 42533), whose main business address is 45 Broadway, Suite 3030, New York, NY 10006. During his employment at Clayton, Dunnings & Company, Inc., Sanducci has worked at a branch office located at 40 Wall Street, 31st Floor, New York, NY 10005.

16. David Sanducci submitted the Offer of Settlement to the NASD Department of Market Regulation on March 1, 2006. Sanducci consented, without admitting or denying, to the NASD findings. The findings alleged that Sanducci took part in a classic boiler room operation while he was employed at Park Capital Securities, LLC (“Park Capital”). Sanducci—acting as a part of a sales team—made material misrepresentations, purposely omitted material facts, and conducted unauthorized transactions in Park Capital customer accounts in connection with the purchase and sale of Cordia Corporation (“Cordia”) shares. Sanducci also failed to provide Park Capital customers with proper disclosures regarding the risks of penny stock investments. Finally, Sanducci provided false and misleading sworn testimony in connection with the NASD investigation.

17. The NASD order accepting the Offer of Settlement permanently bars Sanducci from associating with any NASD member, in any capacity.

SANDUCCI IS THE SUBJECT OF AN ORDER BY A SELF-REGULATORY ORGANIZATION EXPELLING HIM FROM A NATIONAL SECURITIES ASSOCIATION REGISTERED UNDER THE SECURITIES EXCHANGE ACT OF 1934.

N.J.S.A. 49:3-58(a)(1)

N.J.S.A. 49:3-58(a)(2)(vi)

18. The preceding paragraphs are incorporated by reference as though set forth

verbatim herein.

19. Pursuant to N.J.S.A. 49:3-58(a):

The bureau chief may by order deny, suspend, or revoke any registration if he finds: (1) that the order is in the public interest; and (2) that the applicant or registrant ...(vi)...is the subject of an order of ... a self-regulatory organization ... suspending or expelling him from a national securities or commodities exchange or national securities or commodities association ...registered under the "Securities Exchange Act of 1934..."

20. The Bureau, pursuant to N.J.S.A. 49:3-58 (a)(2)(vi), has proper grounds to revoke Sanducci's registration as a result of the NASD's bar on Sanducci's association in any capacity with any member of NASD.

21. Based upon the foregoing and pursuant to N.J.S.A. 49:3-58 (a)(1) the revocation of Sanducci's registration is in the public interest.

CONCLUSION

For the reasons stated above, it is on this *1st* DAY of *June* 2006 **ORDERED** that the agent registration of David Sanducci be **REVOKED** pursuant to N.J.S.A. 49:3-58(a)(1) and N.J.S.A. 49:3-58(a)(2)(vi).


Franklin L. Widmann
Chief, Bureau of Securities

Dated:

June 1, 2006

NOTICE OF RIGHT TO HEARING

Pursuant to the Uniform Securities Law (1997), N.J.S.A. 49:3-47 et seq., specifically, N.J.S.A. 49:3-58(c), the bureau chief shall entertain on no less than three days notice, a written application to lift the summary revocation on written application of the applicant or registrant and in connection therewith may, but need not, hold a hearing and hear testimony, but shall provide to the applicant or registrant a written statement of the reasons for the summary revocation.

This matter will be set down for a hearing if a written request for such a hearing is filed with the Bureau within 15 days after the respondent receives this Order. A request for a hearing must be accompanied by a written response, which addresses specifically each of the allegations set forth in the Order. A general denial is unacceptable. At any hearing involving this matter, an individual respondent may appear on his/her own behalf or be represented by an attorney.

Orders issued pursuant to this subsection to suspend or revoke any registration shall be subject to an application to vacate upon 10 days' notice, and a preliminary hearing on the order to suspend or revoke any registration shall be held in any event within 20 days after it is requested, and the filing of a motion to vacate the order shall toll the time for filing an answer and written request for a hearing.

If no hearing is requested, the Order shall be entered as a Final Order and will remain in effect until modified or vacated. If a hearing is held, the Bureau Chief shall affirm, vacate or modify the order in accord with the findings made at the hearing.

NOTICE OF OTHER ENFORCEMENT REMEDIES

You are advised that the Uniform Securities Law provides several enforcement remedies,

which are available to be exercised by the Bureau Chief, either alone or in combination. These remedies include, in addition to this action revoking your registration, the right to seek and obtain injunctive and ancillary relief in a civil enforcement action, N.J.S.A. 49:3-69, and the right to seek and obtain civil penalties in an administrative or civil action, N.J.S.A. 49:3-70.1.

You are further advised that the entry of the relief requested does not preclude the Bureau Chief from seeking and obtaining other enforcement remedies against you in connection with the claims made against you in this action.