

**CERTIFIED FINANCIAL PLANNER BOARD OF STANDARDS, INC.
WASHINGTON D.C.**

In the Matter of

Christopher D. Martin,

Respondent.

CFP Board Case No. 2025-66969

September 19, 2025



INTERIM SUSPENSION ORDER

On March 7, 2025, Enforcement Counsel for Certified Financial Planner Board of Standards, Inc. (“CFP Board”) filed a Petition for Interim Suspension Order (“Petition”) under Article 2.1.a.1 of CFP Board’s *Procedural Rules*. The Petition requests that a Hearing Panel of the Disciplinary and Ethics Commission (“Commission”) issue an interim suspension order against Respondent. Respondent did not file a response to the Petition.

Neither party requested a hearing, and counsel for the Commission has determined that none is warranted.

For the reasons stated below, the Petition is **GRANTED**.

I. BACKGROUND

CFP Board granted Respondent the right to use the CFP[®], CERTIFIED FINANCIAL PLANNER[®],  and  certification marks (“CFP[®] marks”) on January 6, 2019, and he has maintained his certification since that date.

A. Petition for Interim Suspension

In support of its Petition, Enforcement Counsel cites a January 14, 2025 letter of Acceptance Waiver and Consent (“AWC”) that Respondent entered with the Financial Industry Regulatory Authority, Inc. (“FINRA”). In the AWC, Respondent consented to findings that he participated in private securities transactions without prior approval from his firm, in violation of FINRA Rules 3280 and 2010. (Petition, Ex. A (“Ex. A”) at 33.) The AWC suspended Respondent from association with any FINRA member in all capacities for two years and imposed a \$15,000 fine. (*Id.* at 35.)

The AWC includes findings that Respondent co-founded a management company that, through its subsidiaries, sought to cultivate and manufacture cannabis products. Respondent served as an executive officer and board member of the company and disclosed those roles to his firm. (*Id.* at 33-34.) He did not, however, disclose his participation in the company’s efforts to raise capital, and he did not receive his firm’s approval to participate in those activities. (*Id.*) Between July 2017 and October 2022,

In the Matter of Chris Martin
CFP Board Case No. 2025-67105
September 19, 2025

Respondent participated in the company's sale of more than \$4.4 million of stock to 106 investors through a private offering. Nineteen of the investors that Respondent introduced to the investment opportunity were clients of his firm. (*Id.* at 34.)

According to the AWC, Respondent presented information to prospective investors and at times facilitated investors' transactions by accepting investor subscription agreements. (*Id.*) On six annual compliance questionnaires from 2017 to 2022 Respondent inaccurately represented that he had not engaged in any private securities transactions including "the raising of capital through stock, bond, or note offerings." (*Id.*) By participating in private securities transactions without prior written notice to or approval from his firm, Respondent violated FINRA Rules 3280 and 2010. (*Id.*)

Enforcement Counsel argues in its Petition that the conduct outlined in the AWC reflects adversely on Respondent's integrity and fitness as a CFP® professional because he willfully violated FINRA rules for his own benefit. Enforcement asserts that Respondent's conduct likely would result in a suspension under CFP Board's *Sanction Guidelines*. (Pet. at 4.) Enforcement Counsel maintains that Respondent's interim suspension would serve the public interest by maintaining the integrity of the CFP certification marks, which the public relies on to represent the highest standard of ethical conduct. (*Id.*)

II. DISCUSSION

Article 2.1.a.3 states that the Hearing Panel must grant the Petition and issue an interim suspension order if Enforcement Counsel has demonstrated by a preponderance of the evidence that: (a) Respondent's conduct reflects adversely on his integrity or fitness as a CFP® professional, on the CFP Board certification marks, or on the profession; (b) Respondent's conduct likely would result in a sanction of a suspension or greater pursuant to CFP Board's *Sanction Guidelines*; and (c) an interim suspension order would be in the public interest.

Article 7.2 of the *Procedural Rules* provides that a record from a federal, state, local, or foreign governmental agency, self-regulatory organization, other regulatory authority, or court of civil jurisdiction imposing discipline upon Respondent ("Professional Discipline") is conclusive proof of the existence of such Professional Discipline and the facts and violations that serve as the basis for such Professional Discipline. Article 7.2 further provides that the fact that Respondent has not admitted or denied the findings or allegations contained in the record does not affect the conclusiveness of the proof.

FINRA is self-regulatory organization, the AWC is a record of Professional Discipline, and Respondent is the subject of that record. The AWC, therefore, is conclusive proof in this proceeding of Respondent's violations of FINRA rules and the facts underlying those violations.

Respondent's conduct reflects adversely on the CFP certification marks. Under CFP Board's *Code of Ethics and Standards of Conduct* ("Code and Standards") Respondent must comply with laws, rules and

In the Matter of Chris Martin
CFP Board Case No. 2025-67105
September 19, 2025

regulations governing professional services. (*See* Standard A.8.a.) The AWC is conclusive proof that Respondent failed to uphold this obligation. Respondent's failure to disclose to his firm his involvement in more than \$4 million in private securities transactions over a five-year period, and the six inaccurate compliance questionnaires he completed during this time, both reflect adversely on Respondent's integrity and fitness as a CFP® professional, on the CFP Board certification marks, and on the profession.

CFP Board's relevant *Sanction Guidelines* provide that Professional Discipline involving a suspension for more than three months should result in suspension of Respondent's CFP Board certification for at least one year and one day. *See Sanction Guidelines*, Conduct 34 (effective August 27, 2012 through June 29, 2020; as revised, effective June 30, 2020 to December 31, 2021); Conduct 35 (effective January 1, 2022 to June 30, 2024.) Respondent's two-year FINRA suspension likely would result in a suspension of at least a year and a day under CFP Board's *Sanction Guidelines*.

Imposing an interim suspension on Respondent is in the public interest. CFP Board's *Code and Standards* and its peer-review disciplinary system exist to maintain high standards of competency and ethics for financial planners for the benefit of the public. Enforcement Counsel has authority to investigate possible violations of the *Code and Standards* and may seek interim suspension of CFP certification marks as it continues its investigation when, as here, a certificant's willful and long-standing violation of applicable rules, laws and regulations calls into immediate question Respondent's commitment to upholding the *Code and Standards*.

III. THE HEARING PANEL'S DECISION

The requirements of Article 2.1.a.3 of the *Procedural Rules* have been met, the Petition is **GRANTED**, and the Hearing Panel issues this **Interim Suspension Order** suspending Respondent's CFP® certification and right to use the CFP Board certification marks pending the outcome of CFP Board's investigation. An interim suspension is a temporary sanction that does not preclude CFP Board from imposing a final sanction, and it will be published in a press release in accordance with Articles 2.2 and 17.7 of the *Procedural Rules*.¹

SO ORDERED

Chair of the Hearing Panel
Disciplinary and Ethics Commission, CFP Board
Date: September 19, 2025

¹ The Petition and any exhibits to this order will not be published.