BEFORE THE SECURITIES COMMISSION
OF THE STATE OF DELAWARE

IN THE MATTER OF:

DOHER FERRIS

Respondent.

(CRD #2929983)

CASE NO. 00-03-02

CONSENT ORDER

1. Preliminary Statement

For purposes of resolving the above-referenced matter, the Division of Securities, Delaware Department of Justice ("Division") and Respondent, Doher Ferris ("Ferris"), with Respondent neither admitting or denying the findings or conclusions set forth herein, do hereby consent to the entry of this Order, instituting an administrative proceeding, making findings and imposing sanctions.

II Findings

1. Doher Ferris is a Broker Dealer Agent registered in Delaware. At all times relevant to this investigation, he was an agent of Pruco Securities Corporation.

2. Doher Ferris was present for a sales presentation with Eddie Ghabour and prior to the purchase of Pruco Mutual Funds by on May 19, 1999. At that initial presentation a representation was made that sales loads would be 2 - 3% of the purchase price, with one fund being as much as 5%. 

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3. In fact the loads for the funds that Mr. purchased were as follows:
   a) Pruco Equity Fund - 4.5%
   b) Pruco Small Co. Value Fund - 4.5%
   c) Pruco World Fund Global - 4.5%
   d) High Yield Bond Fund - 4.0%

4. Doher Ferris' misrepresentation of the actual loads charged for the purchase of the mutual funds sold to constituted a violation of 6 Del. C. § 7303 and § 7316.

5. At all times relevant to the investigation, Doher Ferris was the supervisor of Eddie Ghabour at Pruco Securities.

6. On October 28, 1999, mailed a written complaint to Pruco, following a telephone conversation between and Ferris complaining, in part, about his dealings with Mr. Ghabour.

7. A reasonable investigation by Mr. Ferris following the complaint would have disclosed discrepancies between the facts and the version of events provided by Mr. Ghabour. A review of firm records and Mr. records would also have disclosed the modification of the records subsequent to their execution by Mr.

8. Mr. Ferris' failure to investigate complaints of wrongdoing by Mr. Ghabour, an agent under his supervision, constitutes a failure to reasonably supervise in violation of 6 Del. C. § 7316(a)(10).
III Agreement

In view of the foregoing, the Respondent agrees to the following:

9. Respondent neither admits, nor denies, the findings set forth in paragraphs one through eight of this Agreement/Order and voluntarily consents to the entry of this Order, and further represents and agrees that no employee or representative of the Division of Securities has made any promise, representation or threat to induce its execution, other than the representations contained in this Consent Order.

10. Respondent voluntarily waives his right to an administrative hearing on the allegations as set forth in the findings, and any appeal rights that would have arisen from said hearing in accord with the Securities Act.

11. Respondent agrees to cease and desist all violations of the Delaware Securities Act.

12. Respondent agrees to refrain from committing any future violations of the Act.

13. Respondent agrees, within ten days of the date of final execution of this Order, to pay a Two Thousand Dollar ($2,000.00) fine, made payable to the State of Delaware, Investor Protection Fund. This payment shall be mailed or hand delivered to, Delaware Division of Securities, Department of Justice, 820 N. French Street, 5th Floor, Wilmington, DE 19801, Attention: James Ropp.

14. Respondent agrees to pay interest to in the amount of $178.50.
The check should be made payable to and should be delivered in the same manner, and to the same place as specified in paragraph 13.

15. Respondent understands that this Order is being executed solely for the purpose of resolving and settling this dispute arising out of the specific matter outlined in the above referenced paragraphs. This Order shall have no effect on the Securities Division, or its agents’ ability to take action with regard to any conduct of Respondent not related to the above referenced incidents, or to any conduct of Respondent which occurs subsequent to the execution of this Order.

16. Respondent agrees to make no statement, comment, or representation, public or private, written or oral, including, but not limited to his U-4 disclosure, which is inconsistent with the terms of this Agreement, except in the event that he may be called to defend himself in litigation.

IV Order

In view of the foregoing, the Securities Commissioner has determined that it is in the public interest to accept the above settlement. Accordingly, it is hereby ORDERED that:

1. Respondent shall cease and desist all violations of the Delaware Securities Act.


3. Respondent shall pay an administrative fine in the amount of Two Thousand Dollars ($2,000.00) made payable to the State of Delaware, Investor Protection Fund, in the
manner set forth in Paragraph 13 of the Agreement.

4. Respondent shall pay interest to in the amount of $178.50 by check made payable to and said check will be delivered to the State of Delaware for ultimate delivery to in the manner set forth in paragraph 14.

5. Respondent shall comply with all terms of the Agreement and Order set forth above.

Executed this 19th day of February, 2004

[Signature]
Doher Ferris

Executed this 20th day of February, 2004

[Signature]
Leonard Williams, Esquire
Attorney for Respondent

Executed this 20th day of February, 2004

[Signature]
James B. Ropp
Securities Commissioner